

EXHIBIT 37

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25

IN THE UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

JOHN P. "JACK" FLYNN, §
et al, §
§
Plaintiffs, §
§
vs. § Civil Action No.
§ 1:21-CV-02587-GHW
§
CABLE NEWS NETWORK, §
INC., §
§
Defendant. §

* * * * *
REMOTE VIDEOTAPED ORAL DEPOSITION OF
WILSON POWELL
May 6, 2023
* * * * *

REMOTE VIDEOTAPED ORAL DEPOSITION OF WILSON
POWELL, produced as a witness and duly sworn, was
taken in the above-styled and -numbered cause on
May 6, 2023, from 9:00 a.m. until 10:51 a.m., (CDT),
before Suzanne Kelly, Registered Diplomate Reporter
and Certified Realtime Reporter, reported by
stenographic method with all attendees appearing
remotely from separate locations, pursuant to the
Federal Rules of Civil Procedure and the provisions
stated on the record, if any.

Reported by: Suzanne Kelly, CSR, RDR, CRR
Job: 5871702

<p style="text-align: right;">Page 2</p> <p>1 APPEARANCES</p> <p>2</p> <p>3 FOR THE PLAINTIFFS:</p> <p>4 Steven S. Biss, Esq.</p> <p>5 LAW OFFICE OF STEVEN S. BISS</p> <p>6 300 West Main Street</p> <p>7 Suite 102</p> <p>8 Charlottesville, Virginia 22903</p> <p>9 804.501.8272</p> <p>10 stevenbiss@earthlink.net</p> <p>11</p> <p>12 FOR THE DEFENDANT:</p> <p>13 Lindsey Cherner, Esq.</p> <p>14 Katherine M. Bolger, Esq.</p> <p>15 DAVIS WRIGHT TREMAINE, L.L.P.</p> <p>16 1251 Avenue of the Americas</p> <p>17 21st Floor</p> <p>18 New York, New York 10020</p> <p>19 212.489.8230</p> <p>20 lindseycherner@dwt.com</p> <p>21</p> <p>22 FOR THE WITNESS:</p> <p>23 William L. "Lewis" Sessions, Esq.</p> <p>24 MOORE GANSKE MURR SESSIONS, P.L.L.C.</p> <p>25 15851 N. Dallas Parkway</p> <p>Suite 180</p> <p>Addison, Texas 75001</p> <p>214.217.8855</p> <p>lsessions@mgmspllc.com</p> <p>Robert H. Holmes, Esq.</p> <p>THE HOLMES LAW FIRM, P.L.L.C.</p> <p>19 St. Laurent Place</p> <p>Dallas, Texas 75225</p> <p>214.384.3182</p> <p>rhholmes@swbell.net</p>	<p style="text-align: right;">Page 4</p> <p>1 INDEX</p> <p>2 PAGE</p> <p>3 Appearances 2</p> <p>4 WILSON POWELL</p> <p>5 Examination by Ms. Cherner 7</p> <p>6 Examination by Mr. Biss 82</p> <p>7 Signature and Changes 86</p> <p>8 Reporter's Certificate 88</p> <p>9</p> <p>10 EXHIBITS</p> <p>11</p> <p>12</p> <p>13 NO. DESCRIPTION PAGE</p> <p>14 Exhibit 390 A copy of a 53-second video, 46</p> <p>Tab 1</p> <p>15</p> <p>16 Exhibit 391 A one-page copy of a Tweet 58</p> <p>from General Flynn, Bates</p> <p>labeled PX_250, Tab 13</p> <p>(Designated as "Confidential")</p> <p>17 Exhibit 392 A copy of a 53-second video, 66</p> <p>18 Bates labeled PX_189, Tab 2</p> <p>19</p> <p>20 Exhibit 393 A one-page copy of an e-mail, 67</p> <p>Bates labeled WBP_CNN_770,</p> <p>Tab 18</p> <p>21</p> <p>22 Exhibit 394 A two-page copy of a message 69</p> <p>exchange, Bates labeled</p> <p>WBP_CNN_941 through WBP_CNN_942,</p> <p>23 Tab 31</p> <p>24</p> <p>25</p>
<p style="text-align: right;">Page 3</p> <p>1 APPEARANCES (Continued)</p> <p>2</p> <p>3 ALSO PRESENT:</p> <p>4 Mr. Christopher Archie, Videographer</p> <p>5 Mr. Michael Toth, Document Technician,</p> <p>michael@tothic.com</p> <p>6 Mr. Jack Flynn</p> <p>7</p> <p>8</p> <p>9</p> <p>10</p> <p>11</p> <p>12</p> <p>13</p> <p>14</p> <p>15</p> <p>16</p> <p>17</p> <p>18</p> <p>19</p> <p>20</p> <p>21</p> <p>22</p> <p>23</p> <p>24</p> <p>25</p>	<p style="text-align: right;">Page 5</p> <p>1 PROCEEDINGS</p> <p>2 THE VIDEOGRAPHER: Good morning,</p> <p>3 everyone. Current time is 9:00 a.m., May 6th,</p> <p>4 2023, and we are now on the record. This is</p> <p>5 Media Unit 1 of the recorded deposition of</p> <p>6 Wilson Powell taken by counsel for Defendant in</p> <p>7 the matter of Jack P. Flynn, et al., versus</p> <p>8 Cable News Network, Inc., filed in the</p> <p>9 United States District Court,</p> <p>10 Southern District of New York, Case Number</p> <p>11 1:21-CV-02587-GHW.</p> <p>12 My name is Christopher Archie,</p> <p>13 representing Veritext. And I am the</p> <p>14 Videographer.</p> <p>15 The Court Reporter is Suzanne Kelly</p> <p>16 from the firm, Veritext.</p> <p>17 Counsel and all present will now</p> <p>18 state their appearances and affiliations for</p> <p>19 the record beginning with the Noticing</p> <p>20 attorney.</p> <p>21 MS. CHERNER: Lindsey Cherner of</p> <p>22 Davis Wright Tremaine for CNN.</p> <p>23 On Zoom is also Kate Bolger, also</p> <p>24 of Davis Wright Tremaine, on behalf of CNN.</p> <p>25 MR. BISS: I am Steve Biss. I</p>

<p style="text-align: right;">Page 6</p> <p>1 represent the Plaintiffs.</p> <p>2 THE VIDEOGRAPHER: Will the Court</p> <p>3 Reporter please swear in the witness? And</p> <p>4 counsel may proceed.</p> <p>5 THE COURT REPORTER: If you would</p> <p>6 please raise your right hand, I will administer</p> <p>7 the witness's oath to you.</p> <p>8 THE WITNESS: (Complies.)</p> <p>9 THE COURT REPORTER: Do you</p> <p>10 solemnly swear or affirm that the testimony which</p> <p>11 you will give in this case will be the truth, the</p> <p>12 whole truth, and nothing but the truth, so help</p> <p>13 you God?</p> <p>14 THE WITNESS: Yes.</p> <p>15 THE COURT REPORTER: Thank you.</p> <p>16 MS. CHERNER: Before we begin the</p> <p>17 deposition, I just want to stipulate with</p> <p>18 Mr. Biss that we have an agreement, even though</p> <p>19 this deposition was Noticed through the</p> <p>20 Southern District of New York, that it will also</p> <p>21 be used in the Middle District of Florida cases.</p> <p>22 Right?</p> <p>23 MR. BISS: Correct.</p> <p>24 MS. CHERNER: Thank you.</p> <p>25</p>	<p style="text-align: right;">Page 8</p> <p>1 question, I am not trying to trick you, so please</p> <p>2 just let me know and I will rephrase it. Is that</p> <p>3 okay?</p> <p>4 A. Yes.</p> <p>5 Q. There is a Court Reporter taking down my</p> <p>6 questions and your answers. For the benefit of</p> <p>7 the Court Reporter, we should try not to talk</p> <p>8 over each other. Okay?</p> <p>9 A. Yes, ma'am.</p> <p>10 Q. Please wait until I finish asking my</p> <p>11 question before you begin your answer, and I will</p> <p>12 wait until finishing your -- until you finish</p> <p>13 your answer before asking my next question. Is</p> <p>14 that okay?</p> <p>15 A. Yes.</p> <p>16 Q. I know it's unnatural, but you should</p> <p>17 also give me oral responses. So please say,</p> <p>18 "yes" or "no," instead of shaking your head or</p> <p>19 nodding that. That way, the Court Reporter can</p> <p>20 get down your answer. Is that okay?</p> <p>21 A. Yes.</p> <p>22 Q. Great. Also from time to time, your</p> <p>23 attorney, Mr. Sessions, may object to the</p> <p>24 structure or nature of my question. You should</p> <p>25 still answer the question.</p>
<p style="text-align: right;">Page 7</p> <p>1 EXAMINATION</p> <p>2 BY MS. CHERNER:</p> <p>3 Q. Good morning, Mr. Powell. Thank you for</p> <p>4 doing this on a Saturday.</p> <p>5 A. Thank you. Yeah. On a Saturday.</p> <p>6 Q. Can you state your full name for the</p> <p>7 record?</p> <p>8 A. Wilson Powell.</p> <p>9 Q. And your middle name?</p> <p>10 A. Bowden.</p> <p>11 Q. You are represented by an attorney in</p> <p>12 connection with this deposition. Is that</p> <p>13 correct?</p> <p>14 A. Yes.</p> <p>15 Q. Which attorney is representing you</p> <p>16 today?</p> <p>17 A. Mr. Sessions.</p> <p>18 Q. Have you ever been deposed before?</p> <p>19 A. No.</p> <p>20 Q. Okay. I am going to go over some ground</p> <p>21 rules with you, your attorney, Mr. Sessions, may</p> <p>22 have already done this.</p> <p>23 I will ask you a series of</p> <p>24 questions that you will answer today under</p> <p>25 oath. If at any point you don't understand my</p>	<p style="text-align: right;">Page 9</p> <p>1 If at any time you would like to</p> <p>2 take a break, please let me know. I am happy</p> <p>3 to take one whenever you would like a break. I</p> <p>4 just ask that if I have a question pending that</p> <p>5 you answer that question first, and then we can</p> <p>6 take a break right after. Is that okay?</p> <p>7 A. Yes.</p> <p>8 Q. Great. Mr. Powell, what did you do to</p> <p>9 prepare for this deposition?</p> <p>10 A. I gave all of my devices and everything</p> <p>11 requested to counsel and listened to counsel as</p> <p>12 to how this would proceed.</p> <p>13 Q. Did you meet with Mr. Sessions in</p> <p>14 person?</p> <p>15 A. Yes.</p> <p>16 Q. For approximately how long?</p> <p>17 A. An hour.</p> <p>18 Q. And was that today, yesterday?</p> <p>19 A. Yesterday.</p> <p>20 Q. Okay. Did you talk to anyone other than</p> <p>21 Mr. Sessions about the subpoena?</p> <p>22 A. Yes.</p> <p>23 Q. Who?</p> <p>24 A. Mr. Holmes.</p> <p>25 Q. Okay. And when did you speak to</p>

<p style="text-align: right;">Page 10</p> <p>1 Mr. Holmes about the subpoena?</p> <p>2 A. Earlier this week.</p> <p>3 Q. For approximately how long?</p> <p>4 A. Probably about an hour as well.</p> <p>5 Q. Was that in person or on the phone?</p> <p>6 A. In person.</p> <p>7 Q. Okay. Did you speak to anyone else</p> <p>8 about this subpoena?</p> <p>9 A. No.</p> <p>10 Q. You didn't speak to your mother about</p> <p>11 the subpoena?</p> <p>12 A. I spoke to all of my counsel.</p> <p>13 Q. Okay. And you did not speak to any</p> <p>14 of the Flynn family members about this subpoena?</p> <p>15 A. No. I did not speak to them, no.</p> <p>16 Q. Okay. You also didn't speak with</p> <p>17 Mr. Biss about this subpoena?</p> <p>18 A. No. I did not, but Ms. Powell is also</p> <p>19 my counsel so I did speak to her. I spoke with</p> <p>20 my counsel.</p> <p>21 Q. Okay. So you did speak to your mom?</p> <p>22 A. Yes.</p> <p>23 Q. Okay. I have an agreement with your</p> <p>24 counsel that we are not going to put your address</p> <p>25 or your cell phone on the record. I just want to</p>	<p style="text-align: right;">Page 12</p> <p>1 Q. Okay. How often do you use your</p> <p>2 Facebook?</p> <p>3 A. Almost every day to some degree.</p> <p>4 Q. Okay. Do you use it to communicate with</p> <p>5 the Flynns?</p> <p>6 A. I did previously.</p> <p>7 Q. Okay. And you no longer do?</p> <p>8 A. Correct.</p> <p>9 Q. When did you stop communicating with the</p> <p>10 Flynns on Facebook?</p> <p>11 A. I can't remember, but it's been at least</p> <p>12 a year.</p> <p>13 Q. Is there any specific reason why you</p> <p>14 stopped communicating with the Flynns on</p> <p>15 Facebook?</p> <p>16 A. No. I don't have Facebook Messenger on</p> <p>17 my phone.</p> <p>18 Q. Okay.</p> <p>19 A. I don't use Facebook Messenger as much.</p> <p>20 Q. Okay.</p> <p>21 A. But...</p> <p>22 Q. Do you have an Instagram user name?</p> <p>23 A. Yes.</p> <p>24 Q. And what is it?</p> <p>25 A. It's POWELW10, I believe.</p>
<p style="text-align: right;">Page 11</p> <p>1 make a note that we will confirm that over e-mail</p> <p>2 after this deposition.</p> <p>3 A. Okay.</p> <p>4 MR. SESSIONS: That's agreed to by</p> <p>5 counsel.</p> <p>6 BY MS. CHERNER:</p> <p>7 Q. Do you have any social media,</p> <p>8 Mr. Powell?</p> <p>9 A. Yes.</p> <p>10 Q. What is your Facebook user name?</p> <p>11 A. I think it's MKTRVN. I don't -- I think</p> <p>12 so. I don't know my Facebook user name. Like I</p> <p>13 don't know the link to my Facebook profile.</p> <p>14 Q. Do you know what name you go by on</p> <p>15 Facebook?</p> <p>16 A. Yes.</p> <p>17 Q. Do you go by your real name?</p> <p>18 A. No.</p> <p>19 Q. Okay. So sorry. Can you repeat that</p> <p>20 again?</p> <p>21 A. What? My Facebook name I go by?</p> <p>22 Q. Yes.</p> <p>23 A. Wilson BP.</p> <p>24 Q. Wilson BP?</p> <p>25 A. Yes.</p>	<p style="text-align: right;">Page 13</p> <p>1 Q. And how often do you use that Instagram</p> <p>2 account?</p> <p>3 A. Daily for various purposes, as well.</p> <p>4 Q. Do you use it ever to communicate with</p> <p>5 the Flynns?</p> <p>6 A. I did previously, as well.</p> <p>7 Q. And approximately when did you stop</p> <p>8 communicating with the Flynns on Instagram?</p> <p>9 A. Around a year or more ago. I'm not</p> <p>10 sure. I don't remember.</p> <p>11 Q. And what is the basis for the</p> <p>12 communication ending?</p> <p>13 A. I don't have one. I just didn't</p> <p>14 communicate.</p> <p>15 Q. There was nothing wrong? You just</p> <p>16 aren't communicating with them right now?</p> <p>17 A. Correct.</p> <p>18 Q. Okay. Do you have a Twitter account?</p> <p>19 A. Yes.</p> <p>20 Q. And what is your Twitter handle?</p> <p>21 A. Market_Raven.</p> <p>22 Q. And what is Market Raven?</p> <p>23 A. So my background is finance. So, it's</p> <p>24 basically a finance Twitter.</p> <p>25 Q. Do you use your Twitter exclusively for</p>

<p style="text-align: right;">Page 14</p> <p>1 finance postings?</p> <p>2 A. Yes.</p> <p>3 Q. Okay. So you don't use that Twitter</p> <p>4 account to communicate or re-Tweet the Flynns?</p> <p>5 A. I don't know if I re-Tweeted anything or</p> <p>6 not. But I don't use it for those purposes, no.</p> <p>7 Q. Okay. Do you have a Truth Social</p> <p>8 account?</p> <p>9 A. No.</p> <p>10 Q. Have you ever had a Truth Social</p> <p>11 account?</p> <p>12 A. No.</p> <p>13 Q. Do you have a CloutHub account?</p> <p>14 A. No.</p> <p>15 Q. Have you ever had a CloutHub account?</p> <p>16 A. No.</p> <p>17 Q. Do you have a Parler account?</p> <p>18 A. No.</p> <p>19 Q. Have you ever had a Parler account?</p> <p>20 A. No.</p> <p>21 Q. Do you have a Patreon account?</p> <p>22 A. Yes.</p> <p>23 Q. What is that user name?</p> <p>24 A. I used to have one, I believe.</p> <p>25 Q. Okay. So let me clarify. Are you</p>	<p style="text-align: right;">Page 16</p> <p>1 A. LinkedIn.</p> <p>2 Q. Okay. And what is your name on</p> <p>3 LinkedIn?</p> <p>4 A. Wilson Powell.</p> <p>5 Q. Do you ever use LinkedIn messenger to</p> <p>6 message the Flynns?</p> <p>7 A. No.</p> <p>8 Q. Okay. Are you currently employed?</p> <p>9 A. Yes.</p> <p>10 Q. Where?</p> <p>11 A. A software service company here in</p> <p>12 Dallas.</p> <p>13 Q. And that company is called what?</p> <p>14 A. Unifocus.</p> <p>15 Q. How long have you been in that role?</p> <p>16 A. This year.</p> <p>17 Q. Approximately when did you start?</p> <p>18 A. June 1.</p> <p>19 Q. Okay. And prior to that, what was your</p> <p>20 employment prior to that?</p> <p>21 A. Jefferson Dental & Orthodontics.</p> <p>22 Q. For how long?</p> <p>23 A. Seven months or so.</p> <p>24 Q. Okay. And then before that?</p> <p>25 A. Eden Green Technology.</p>
<p style="text-align: right;">Page 15</p> <p>1 saying that you previously had a Patreon account</p> <p>2 that you don't have anymore?</p> <p>3 A. A Patreon account? I'm sorry.</p> <p>4 Q. Patreon?</p> <p>5 A. No. No. I don't have that.</p> <p>6 Q. And you never had a Patreon account?</p> <p>7 A. No.</p> <p>8 Q. Do you have a Gab account?</p> <p>9 A. No.</p> <p>10 Q. Have you ever had a Gab account?</p> <p>11 A. No.</p> <p>12 Q. Do you have a Rumble account?</p> <p>13 A. No.</p> <p>14 Q. Have you ever had a Rumble account?</p> <p>15 A. No.</p> <p>16 Q. Do you have a Gettr account?</p> <p>17 A. No.</p> <p>18 Q. Have you ever had a Gettr account?</p> <p>19 A. No.</p> <p>20 Q. Have you ever been suspended from any</p> <p>21 social media platform?</p> <p>22 A. No.</p> <p>23 Q. Are there any other social media</p> <p>24 accounts that you have that I have not asked you</p> <p>25 about?</p>	<p style="text-align: right;">Page 17</p> <p>1 Q. And before that?</p> <p>2 A. I was in New Orleans at a -- basically</p> <p>3 at a hedge fund.</p> <p>4 Q. Okay. And then did you have any other</p> <p>5 employment before that?</p> <p>6 A. I worked at a rock climbing gym when I</p> <p>7 was younger.</p> <p>8 Q. Okay. So your first professional</p> <p>9 employment was the one in New York that you just</p> <p>10 referenced?</p> <p>11 A. In New York? I'm sorry. Where?</p> <p>12 Q. Sorry. You said it was in New York?</p> <p>13 A. No. I didn't say it was in New York.</p> <p>14 Q. Where was it?</p> <p>15 A. My first job or which job? I'm sorry.</p> <p>16 Q. Your first job before -- or after the</p> <p>17 rock climbing.</p> <p>18 A. New Orleans.</p> <p>19 Q. New Orleans. Sorry.</p> <p>20 A. Yes.</p> <p>21 Q. I thought -- I thought you said, "New</p> <p>22 York." In New Orleans. So New Orleans was your</p> <p>23 first professional employment?</p> <p>24 A. Yes.</p> <p>25 Q. Full-time?</p>

<p style="text-align: right;">Page 18</p> <p>1 A. (Nods.)</p> <p>2 Q. Okay. At any time, were you employed by</p> <p>3 your mother, Sidney Powell?</p> <p>4 A. Personally, yes.</p> <p>5 Q. Explain what you mean by that.</p> <p>6 A. I worked with her personally and helped</p> <p>7 her with anything a lawyer didn't</p> <p>8 need -- anything a lawyer wasn't needed for, like</p> <p>9 running errands or helping with IT stuff.</p> <p>10 Q. So you were never on her payroll?</p> <p>11 A. I don't -- I don't know what that means.</p> <p>12 Q. Did she pay you?</p> <p>13 A. Yes. Personally.</p> <p>14 Q. You are making a distinction with this</p> <p>15 "personally." Can you just explain what you mean</p> <p>16 by that?</p> <p>17 A. Her PC.</p> <p>18 Q. Her PC?</p> <p>19 A. Yes.</p> <p>20 Q. Can you explain what you mean by that?</p> <p>21 A. Her --</p> <p>22 MR. SESSIONS: I think what the</p> <p>23 witness is referring to is Ms. Powell maintains a</p> <p>24 law practice as a PC, professional --</p> <p>25 BY MS. CHERNER:</p>	<p style="text-align: right;">Page 20</p> <p>1 for that.</p> <p>2 Q. The first time that you met them was at</p> <p>3 a family -- was in Rhode Island?</p> <p>4 A. Yes.</p> <p>5 Q. And by "them," who do you mean?</p> <p>6 A. The Flynn family.</p> <p>7 Q. Can you name the Flynns that you met for</p> <p>8 the first time in Rhode Island?</p> <p>9 A. All of the Flynns, Mike, Joe, I believe</p> <p>10 Joe's wife's name is Valerie, Lori.</p> <p>11 Q. Okay. And you're -- when you say that</p> <p>12 you met them, this is the first time you met them</p> <p>13 in person.</p> <p>14 A. Yes.</p> <p>15 Q. But had you previously communicated with</p> <p>16 the Flynn family members prior to July 4th, 2020?</p> <p>17 A. I don't remember. I don't believe so.</p> <p>18 Wait. I'm sorry. Before July</p> <p>19 2020, yes, but that was the trip before July</p> <p>20 2020.</p> <p>21 Q. When was that trip?</p> <p>22 A. I don't remember when the trip was. It</p> <p>23 was several months before that.</p> <p>24 Q. Can you give me an approximate time?</p> <p>25 A. Summer.</p>
<p style="text-align: right;">Page 19</p> <p>1 Q. You are talking about her law practice.</p> <p>2 But what exactly did you do for her other than</p> <p>3 running errands? Was there anything else that</p> <p>4 you did?</p> <p>5 A. IT.</p> <p>6 Q. By "IT," what do you mean? What types</p> <p>7 of things with IT were you helping her with?</p> <p>8 A. She would occasionally have a computer</p> <p>9 problem or connectivity issue or something that</p> <p>10 she needed someone younger to help with.</p> <p>11 Q. Okay. You are not a licensed attorney?</p> <p>12 Right?</p> <p>13 A. Correct.</p> <p>14 Q. And did you take any paralegal courses?</p> <p>15 A. No.</p> <p>16 Q. You don't hold yourself out to be a</p> <p>17 paralegal?</p> <p>18 A. No.</p> <p>19 Q. Okay. When did you first meet the Flynn</p> <p>20 family?</p> <p>21 A. I'm sorry. When or how?</p> <p>22 Q. When and -- well, when and how? But</p> <p>23 first, when? When did you meet them?</p> <p>24 A. So the first, it was a family wedding</p> <p>25 weekend that was in Rhode Island, and I met them</p>	<p style="text-align: right;">Page 21</p> <p>1 Q. And what was the purpose of that first</p> <p>2 trip to Rhode Island?</p> <p>3 A. That was the wedding trip.</p> <p>4 Q. Okay. And whose wedding was that?</p> <p>5 A. I can't remember which Flynn family</p> <p>6 member was getting married. I can't remember the</p> <p>7 name.</p> <p>8 Q. Was it -- was it Barbara's daughter?</p> <p>9 A. It may have been. I believe it was the</p> <p>10 regular wedding.</p> <p>11 Q. Okay. So you don't recall the exact</p> <p>12 time of that wedding?</p> <p>13 A. No.</p> <p>14 Q. But it was a couple of months before</p> <p>15 July 4th, 2020?</p> <p>16 A. I believe so. Yes.</p> <p>17 Q. Okay. The when was the first time you</p> <p>18 communicated with General Flynn?</p> <p>19 A. I don't remember.</p> <p>20 Q. Was it in 2019?</p> <p>21 MR. BISS: I think he said he</p> <p>22 doesn't remember. That's what I heard anyway,</p> <p>23 here in Charlottesville, Virginia.</p> <p>24 THE WITNESS: I don't remember.</p> <p>25 BY MS. CHERNER:</p>

<p style="text-align: right;">Page 22</p> <p>1 Q. Do you recall ever texting 2 General Flynn? 3 A. Yes. 4 Q. What did you text about? 5 A. I don't remember specifically. Do you 6 have exhibits or anything that can help? 7 Q. I am asking -- I am asking the 8 questions. I am just asking if you recall. I am 9 just asking for your recollection. 10 A. Logistics of where to see him, I guess. 11 I don't know. Like one time, I think he was 12 going to come to Dallas and reached out. But I 13 don't know what specifically I spoke with him 14 about. I don't remember. 15 Q. Do you recall approximately when -- or 16 sorry. Never mind. 17 Was your first communication with 18 General Flynn around the time that your mom 19 started representing him in June 2019? 20 A. No. I think it was after that. I think 21 it was after that. 22 Q. Okay. Do you recall how often you 23 communicated with General Flynn? 24 A. Maybe like once every several months. 25 Like for a short period of time.</p>	<p style="text-align: right;">Page 24</p> <p>1 A. One-on-one face to face. Face to face. 2 Q. Where did you see him in person other 3 than the wedding? 4 A. The next trip we went on. 5 Q. Which was where and when? 6 A. So that was also Rhode Island, and it 7 was when it was around the July 4th, 2020, time 8 frame. 9 Q. Okay. And did you see Joe in person 10 after that July 4th, 2020, weekend? 11 A. Yes. 12 Q. Where did you see him in person after? 13 A. He came to Dallas and took me to 14 dinner. 15 Q. Approximately when was that? 16 A. I don't remember. 17 Q. Was it still in 2020, or was it years 18 later? 19 A. That would be still 2020, I believe. 20 Q. Okay. What about Valerie Flynn? When 21 did you meet her? 22 A. I can't remember if I met her at the 23 wedding or at the second trip. 24 Q. And the second trip, you are referring 25 to, is the July 4th, 2020 event at the Flynn's</p>
<p style="text-align: right;">Page 23</p> <p>1 Q. Was it for business or personal 2 reasons? 3 A. It was mostly to see how he was doing 4 and say, "Hi." 5 Q. What about Lori Flynn? When was the 6 first time you communicated with her? 7 A. I don't remember. 8 Q. Would it have been when you first 9 communicated with General Flynn, or would it have 10 been after that? 11 MR. BISS: He said he didn't 12 remember. 13 THE WITNESS: I mean, it's probably 14 when I met them at the wedding. 15 BY MS. CHERNER: 16 Q. Did you have communications of a 17 personal nature with Lori Flynn or of a business 18 nature with Lori Flynn? 19 A. Personal. 20 Q. What about Joe Flynn? When did you 21 first communicate with him? 22 A. Probably at the wedding weekend, as 23 well. 24 Q. And by what means did you communicate 25 with Joe Flynn?</p>	<p style="text-align: right;">Page 25</p> <p>1 house? 2 A. Yes. 3 Q. Okay. And did you communicate with 4 Valerie Flynn after the July 4th, 2020 trip? 5 A. Which -- so Valerie is Joe's wife? 6 Q. Correct. 7 A. I don't -- I don't think I spoke with 8 her. 9 Q. Again, you are saying you didn't think 10 you spoke with her besides the July 4th, 2020 11 night? 12 A. Correct. 13 Q. Okay. What about Jack Flynn? When did 14 you meet him? 15 A. One of those weekends as well. 16 It was probably the wedding weekend. 17 Q. Okay. And by what means did you 18 communicate with Jack Flynn? 19 A. In person. 20 Q. So you communicated with him in person 21 at the wedding and on July 4th. But did you ever 22 see him anywhere else, in person? 23 A. Not that I remember, no. 24 Q. Okay. So you never communicated with 25 him over texts?</p>

<p style="text-align: right;">Page 26</p> <p>1 A. No. I don't believe so.</p> <p>2 Q. Or over any social media messenger</p> <p>3 platform?</p> <p>4 A. No. I don't believe so.</p> <p>5 Q. What about Leslie Flynn? When did you</p> <p>6 meet her?</p> <p>7 A. Can you remind me? So Leslie Flynn</p> <p>8 is --</p> <p>9 Q. Yeah. So Leslie Flynn is Jack Flynn's</p> <p>10 wife.</p> <p>11 A. Okay.</p> <p>12 Q. When did meet Leslie Flynn?</p> <p>13 A. Either the wedding weekend or the July</p> <p>14 4th weekend.</p> <p>15 Q. And did you ever see her again in</p> <p>16 person?</p> <p>17 A. No. I don't believe so.</p> <p>18 Q. Did you ever communicate with</p> <p>19 Leslie Flynn over text message?</p> <p>20 A. No. I don't believe so.</p> <p>21 Q. Did you ever message with Leslie Flynn</p> <p>22 over social media?</p> <p>23 A. There was, I believe, I think we</p> <p>24 have -- I think we have produced this.</p> <p>25 Q. Yes. You did. I was just wondering if</p>	<p style="text-align: right;">Page 28</p> <p>1 Q. Did you communicate with him over text</p> <p>2 in 2021?</p> <p>3 A. I don't think so.</p> <p>4 Q. Is there a reason why that communication</p> <p>5 ended?</p> <p>6 A. No.</p> <p>7 Q. There was no falling out?</p> <p>8 A. No.</p> <p>9 Q. Okay. What about Barbara Redgate Flynn?</p> <p>10 When did you meet her in person?</p> <p>11 A. Either the wedding or July 4th weekend.</p> <p>12 Q. And did you ever meet her in person</p> <p>13 anywhere besides those two events?</p> <p>14 A. No. I don't believe so.</p> <p>15 Q. Have you ever communicated with her over</p> <p>16 text?</p> <p>17 A. I can't remember. I don't think so.</p> <p>18 Q. Have you ever communicated with her over</p> <p>19 social media?</p> <p>20 A. Yes. And we also produced those. So</p> <p>21 can we go through the production, what was</p> <p>22 produced, please?</p> <p>23 Q. I am -- I am asking for your</p> <p>24 recollection at the moment. So just want to</p> <p>25 confirm that you have communicated with her over</p>
<p style="text-align: right;">Page 27</p> <p>1 there was anything else.</p> <p>2 A. No. Not to my knowledge.</p> <p>3 Q. Okay. What about Michael Flynn, Jr.?</p> <p>4 How did you meet him?</p> <p>5 A. That was either the wedding or July 4th</p> <p>6 weekend as well. It might have been July 4th</p> <p>7 weekend.</p> <p>8 Q. Did you ever see Michael Flynn, Jr., in</p> <p>9 person after July 4th, 2020?</p> <p>10 A. Yes.</p> <p>11 Q. And when was that?</p> <p>12 A. Sometime later in 2020.</p> <p>13 Q. Was that also when you saw Joe Flynn in</p> <p>14 person?</p> <p>15 A. I don't think so. I don't remember, no.</p> <p>16 I don't think so.</p> <p>17 Q. How do you communicate with Michael</p> <p>18 Flynn, Jr.?</p> <p>19 A. I am -- I don't.</p> <p>20 Q. Did you ever communicate with Michael</p> <p>21 Flynn, Jr., over text?</p> <p>22 A. Yes.</p> <p>23 Q. And when approximately did that</p> <p>24 communication end?</p> <p>25 A. I don't remember.</p>	<p style="text-align: right;">Page 29</p> <p>1 social media. Right?</p> <p>2 A. Yes.</p> <p>3 Q. Are there any other Flynnns that you have</p> <p>4 a relationship with that I have not named?</p> <p>5 A. I don't believe so, no.</p> <p>6 Q. There was a time when you and your</p> <p>7 mother went to Rhode Island for the Flynnns' July</p> <p>8 4th, 2020 barbecue. Is that right?</p> <p>9 A. It was more of a seafood cookout, but</p> <p>10 yes.</p> <p>11 Q. Okay. How did -- how did that come to</p> <p>12 pass?</p> <p>13 A. They invited us up to celebrate July</p> <p>14 4th.</p> <p>15 Q. Who was "they"?</p> <p>16 A. The Flynnns.</p> <p>17 Q. Which Flynn invited you?</p> <p>18 A. Probably Mike. I don't know.</p> <p>19 Q. When you say, "Probably Mike," are you</p> <p>20 saying probably General Michael Flynn?</p> <p>21 A. I don't know. I don't know who invited</p> <p>22 us.</p> <p>23 Q. Were you personally invited, or were you</p> <p>24 invited through your mom?</p> <p>25 A. I was invited through my mother.</p>

<p style="text-align: right;">Page 30</p> <p>1 Q. Did you have any direct communication</p> <p>2 with a Flynn inviting you personally to the</p> <p>3 event? Or was it your mom telling you, we are</p> <p>4 going to Rhode Island for July 4th?</p> <p>5 MR. SESSIONS: Hold on a minute.</p> <p>6 Object to the form. Compound.</p> <p>7 BY MS. CHERNER:</p> <p>8 Q. You can answer.</p> <p>9 A. Would you please rephrase the question?</p> <p>10 I don't understand the question.</p> <p>11 Q. Sure. Did the Flynns communicate with</p> <p>12 your mother to invite the both of you.</p> <p>13 A. Yes.</p> <p>14 Q. And so that's why you don't know for</p> <p>15 sure which Flynn invited you?</p> <p>16 A. Yes.</p> <p>17 Q. But you suspect it was General Michael</p> <p>18 Flynn?</p> <p>19 A. I don't know.</p> <p>20 Q. Okay. What other Flynn do you think it</p> <p>21 would have been if not him?</p> <p>22 MR. SESSIONS: Objection. Form.</p> <p>23 THE WITNESS: I don't know.</p> <p>24 BY MS. CHERNER:</p> <p>25 Q. So what date did you arrive in Rhode</p>	<p style="text-align: right;">Page 32</p> <p>1 MR. SESSIONS: Objection. Form.</p> <p>2 THE WITNESS: I don't -- I don't</p> <p>3 remember the sequence.</p> <p>4 BY MS. CHERNER:</p> <p>5 Q. Okay. Did you -- did you wake up? Did</p> <p>6 you have breakfast?</p> <p>7 MR. BISS: When he woke up?</p> <p>8 THE WITNESS: I normally don't eat</p> <p>9 breakfast.</p> <p>10 BY MS. CHERNER:</p> <p>11 Q. Okay. Well, when was the first time</p> <p>12 that you encountered the Flynns that day?</p> <p>13 A. I can't remember July 4th versus another</p> <p>14 day.</p> <p>15 Q. Why?</p> <p>16 A. Because I was relaxing on vacation and</p> <p>17 trying to enjoy the July 4th weekend, and I</p> <p>18 wasn't -- I think it was several days.</p> <p>19 Q. Did you go surfing that day?</p> <p>20 A. I don't remember if it was July 4th or</p> <p>21 another day, but it was the same trip.</p> <p>22 Q. What do you recall discussing with the</p> <p>23 Flynns that day?</p> <p>24 MR. SESSIONS: Objection. Form.</p> <p>25 THE WITNESS: I don't understand</p>
<p style="text-align: right;">Page 31</p> <p>1 Island for the July 4th, 2020 weekend?</p> <p>2 A. I can't remember.</p> <p>3 Q. Did you arrive on July 4th?</p> <p>4 A. No. I don't think so.</p> <p>5 Q. You think you arrived before July 4th?</p> <p>6 A. Yes.</p> <p>7 Q. Okay. I can represent to you July</p> <p>8 4th, 2020, was a Saturday. Does that refresh</p> <p>9 your recollection as to when you may have</p> <p>10 traveled?</p> <p>11 A. No.</p> <p>12 Q. But you know it was before July 4th?</p> <p>13 A. Yes.</p> <p>14 Q. Where did you stay?</p> <p>15 A. A hotel. I can't remember.</p> <p>16 Q. Okay. How did you come to find the</p> <p>17 hotel that you stayed at? Was it through the</p> <p>18 Flynns, or was it on your own searching?</p> <p>19 A. I didn't book the hotel. I don't know.</p> <p>20 I didn't -- I don't know.</p> <p>21 Q. Your mom booked the hotel?</p> <p>22 A. I believe so.</p> <p>23 Q. Okay. Walk me through what you</p> <p>24 recall from July 4th, 2020, starting in the</p> <p>25 morning?</p>	<p style="text-align: right;">Page 33</p> <p>1 the question. It's broad.</p> <p>2 BY MS. CHERNER:</p> <p>3 Q. Do you recall having any conversations</p> <p>4 with the Flynns during the day?</p> <p>5 A. Yes.</p> <p>6 Q. Do you recall the nature of any of those</p> <p>7 communications?</p> <p>8 A. Well, at some point during the trip, I</p> <p>9 learned how to surf. Mike taught me how to</p> <p>10 surf.</p> <p>11 Q. Okay. So you had a conversation about</p> <p>12 surfing, and then you went surfing. Right?</p> <p>13 A. Yes.</p> <p>14 Q. Okay. At any point, did you have a</p> <p>15 conversation about the Take the Oath Movement?</p> <p>16 A. No.</p> <p>17 Q. Do you know what the Take the Oath</p> <p>18 Movement is?</p> <p>19 A. No.</p> <p>20 Q. You have never known what the Take the</p> <p>21 Oath Movement is?</p> <p>22 A. No.</p> <p>23 Q. You have never seen "#TakeTheOath" on</p> <p>24 Twitter?</p> <p>25 A. I saw it in the document request.</p>

<p style="text-align: right;">Page 34</p> <p>1 Q. Other than through the subpoena, you</p> <p>2 have never seen "#TakeTheOath"?</p> <p>3 A. Not that I remember.</p> <p>4 Q. What time did you arrive at the Flynn</p> <p>5 home for the barbecue that night?</p> <p>6 A. I don't remember.</p> <p>7 Q. Sometime before 5:30?</p> <p>8 A. I don't remember.</p> <p>9 Q. Was it day light?</p> <p>10 A. Yes.</p> <p>11 Q. Who do you remember seeing at the July</p> <p>12 4th barbecue?</p> <p>13 A. Mike, Lori, Joe, Barbara, I believe.</p> <p>14 That's what I can recall.</p> <p>15 Q. Do you recall seeing Jack and</p> <p>16 Leslie Flynn?</p> <p>17 A. Yes.</p> <p>18 Q. Do you remember seeing Joe and Valerie</p> <p>19 Flynn?</p> <p>20 A. Yes.</p> <p>21 Q. Do you recall any other Flynns other</p> <p>22 than those?</p> <p>23 A. There are a lot of Flynns. I don't</p> <p>24 remember all of the names, just meeting them very</p> <p>25 briefly.</p>	<p style="text-align: right;">Page 36</p> <p>1 specific, counsel?</p> <p>2 BY MS. CHERNER:</p> <p>3 Q. There came a time when the Flynnns took</p> <p>4 an oath during their July 4th, 2020, meeting. Do</p> <p>5 you recall that?</p> <p>6 A. Are you referring to the video?</p> <p>7 Q. Yes.</p> <p>8 A. Yes.</p> <p>9 Q. Okay. Were you told by anyone at any</p> <p>10 time that the Flynnns were going to take an oath</p> <p>11 before they took it?</p> <p>12 A. No.</p> <p>13 Q. Are you aware they chose to take the</p> <p>14 Constitutional Oath of Office?</p> <p>15 A. I don't remember what it was.</p> <p>16 Q. Had you ever heard the Constitutional</p> <p>17 Oath of Office prior to the video?</p> <p>18 MR. SESSIONS: I'm going to object</p> <p>19 to the form. It's not clear as to what you mean</p> <p>20 by that, "oath of office."</p> <p>21 I would ask counsel to specify so</p> <p>22 the witness can tell you accurately what he</p> <p>23 recalls or doesn't recall.</p> <p>24 BY MS. CHERNER:</p> <p>25 Q. Okay. We received an oath video</p>
<p style="text-align: right;">Page 35</p> <p>1 Q. Approximately how many people were at</p> <p>2 the event that evening?</p> <p>3 A. I don't remember exactly.</p> <p>4 Q. Was it more or less than 50 people?</p> <p>5 A. Less.</p> <p>6 Q. Okay. Were there people other than</p> <p>7 Flynn family members there?</p> <p>8 A. Yes.</p> <p>9 Q. And had you met those people before?</p> <p>10 A. No.</p> <p>11 Q. Do you recall any of their names?</p> <p>12 A. No. This is reminding me that my mother</p> <p>13 was there.</p> <p>14 Q. Yes. Of course. But other than Flynn</p> <p>15 family members, other than you and your mother, I</p> <p>16 am just trying to get a sense of it, if you could</p> <p>17 recall anyone else who was also there that</p> <p>18 evening.</p> <p>19 A. No.</p> <p>20 Q. Do you recall approximately how long you</p> <p>21 were at the Flynn home that evening?</p> <p>22 A. No.</p> <p>23 Q. There came a time when the Flynnns took</p> <p>24 an oath. Do you recall that?</p> <p>25 MR. SESSIONS: Can you be more</p>	<p style="text-align: right;">Page 37</p> <p>1 produced by your mother, Sidney. Who took that</p> <p>2 video?</p> <p>3 A. I did.</p> <p>4 Q. Whose phone was it recorded on?</p> <p>5 A. I believe it was hers.</p> <p>6 Q. So explain how that came to pass.</p> <p>7 A. I was given the phone and asked to take</p> <p>8 a video.</p> <p>9 Q. Your mom handed you her phone?</p> <p>10 A. I believe so, yes.</p> <p>11 Q. And who asked you to take the video?</p> <p>12 A. My mom. She handed me her phone.</p> <p>13 Q. So it was your mom who asked you to take</p> <p>14 the video. Is that what you are saying?</p> <p>15 A. Yes.</p> <p>16 Q. And what did she say? What context</p> <p>17 did she give you for why there needed to be a</p> <p>18 video?</p> <p>19 A. She handed me a phone and said that we</p> <p>20 wanted to wish the country a happy July 4th.</p> <p>21 Q. So how did it come to pass that there</p> <p>22 was an oath taken in that video?</p> <p>23 MR. BISS: Object to the form.</p> <p>24 Asked and answered.</p> <p>25 THE WITNESS: I mean, I don't know.</p>

<p style="text-align: right;">Page 38</p> <p>1 BY MS. CHERNER:</p> <p>2 Q. What was your understanding for why it</p> <p>3 needed to be filmed?</p> <p>4 A. Because it was July 4th.</p> <p>5 MR. BISS: Object to the form.</p> <p>6 BY MS. CHERNER:</p> <p>7 Q. Sorry. Can you repeat the answer?</p> <p>8 A. Because it was July 4th.</p> <p>9 Q. Because it was July 4th, you needed to</p> <p>10 take a video?</p> <p>11 MR. SESSIONS: Objection.</p> <p>12 Objection. Form. Argumentative.</p> <p>13 Don't argue with counsel.</p> <p>14 BY MS. CHERNER:</p> <p>15 Q. You can answer the question.</p> <p>16 A. I'm sorry. Can you restate the</p> <p>17 question?</p> <p>18 Q. I'm just trying to understand. So you</p> <p>19 are saying because it was July 4th, you took a</p> <p>20 video. And I am asking: What about that meant</p> <p>21 that you needed to take a video?</p> <p>22 A. I was told that they wanted to take a</p> <p>23 video to wish the country a happy birthday on</p> <p>24 July 4th.</p> <p>25 Q. Who is "they"?</p>	<p style="text-align: right;">Page 40</p> <p>1 BY MS. CHERNER:</p> <p>2 Q. Sure. I am happy to rephrase it.</p> <p>3 So when you are standing in front</p> <p>4 of them to take the video, you testified that</p> <p>5 your mom told you it was a video that needed to</p> <p>6 be taken to say, "Happy Fourth of July."</p> <p>7 So the Flynns didn't speak to you</p> <p>8 before you started the video. Is that what you</p> <p>9 are testifying?</p> <p>10 MR. SESSIONS: Objection. Form.</p> <p>11 Misstates what the witness has testified to.</p> <p>12 Don't answer the question as</p> <p>13 phrased.</p> <p>14 MS. CHERNER: I'm sorry. You are</p> <p>15 instructing your client not to answer the</p> <p>16 question?</p> <p>17 MR. SESSIONS: Not to answer a</p> <p>18 question that's mis-produced and misquotes him.</p> <p>19 I think it's misleading.</p> <p>20 MS. CHERNER: It's not.</p> <p>21 MR. SESSIONS: You can ask another</p> <p>22 question. I am not trying to interfere with your</p> <p>23 question, but you have got to be accurate if you</p> <p>24 are going to try to quote him.</p> <p>25 MS. BOLGER: You know it's improper</p>
<p style="text-align: right;">Page 39</p> <p>1 A. The people in the video.</p> <p>2 Q. You are saying the Flynns wanted to wish</p> <p>3 the country happy birthday?</p> <p>4 A. Yes.</p> <p>5 Q. Why wasn't it just a photo?</p> <p>6 A. I don't know.</p> <p>7 MR. SESSIONS: Objection.</p> <p>8 Objection. Form. Argumentative.</p> <p>9 BY MS. CHERNER:</p> <p>10 Q. Did no one ask you to take a photo?</p> <p>11 A. Not for that.</p> <p>12 Q. What do you mean by that?</p> <p>13 A. Well, so I mean I am a taller guy. A</p> <p>14 lot of people ask me to take pictures and videos.</p> <p>15 So like I could have taken another picture that</p> <p>16 weekend.</p> <p>17 Q. Who told you that the video was taken to</p> <p>18 say, "Happy Fourth of July"?</p> <p>19 A. My mom for one.</p> <p>20 Q. So when you were standing in front of</p> <p>21 them to take the video, you never had a</p> <p>22 conversation with the Flynns?</p> <p>23 MR. SESSIONS: Objection. Form.</p> <p>24 THE WITNESS: I don't -- I don't</p> <p>25 understand that question.</p>	<p style="text-align: right;">Page 41</p> <p>1 not to let the witness answer a question based on</p> <p>2 form.</p> <p>3 MR. SESSIONS: Counsel, I have got</p> <p>4 45 years of experience, am Board-certified and</p> <p>5 been admitted to a dozen federal courts. I know</p> <p>6 exactly what I am doing.</p> <p>7 Ask a proper question, he'll answer</p> <p>8 it. I am not going to allow counsel to misstate</p> <p>9 or misquote it. Period.</p> <p>10 MS. BOLGER: You know it's not</p> <p>11 proper.</p> <p>12 And Lindsey, you can go ahead and</p> <p>13 restate.</p> <p>14 MR. SESSIONS: Excuse me. Excuse</p> <p>15 me. Just a minute. How many counsel are going</p> <p>16 to represent this client in this video?</p> <p>17 I don't want to be double teamed.</p> <p>18 BY MS. CHERNER:</p> <p>19 Q. What did the Flynn family say to you</p> <p>20 before you began filming the video?</p> <p>21 MR. BISS: Objection to form.</p> <p>22 THE WITNESS: That we wanted to</p> <p>23 wish the country a happy birthday on July 4th.</p> <p>24 BY MS. CHERNER:</p> <p>25 Q. So who of the Flynns said that to you?</p>

<p style="text-align: right;">Page 42</p> <p>1 A. I think it was a group thing.</p> <p>2 Q. Please be more specific. What do you</p> <p>3 mean by that? They all said it at the same</p> <p>4 time?</p> <p>5 A. I think everyone wanted to wish the</p> <p>6 country a happy birthday on July 4th.</p> <p>7 Q. So your mom told you the video was to</p> <p>8 wish the country happy birthday on July 4th.</p> <p>9 Right?</p> <p>10 A. Yes.</p> <p>11 Q. And you are saying the Flynns also</p> <p>12 wanted to wish the country happy birthday on July</p> <p>13 4th and that they told you that?</p> <p>14 A. Yes.</p> <p>15 Q. Okay. How long was this conversation</p> <p>16 about wishing the country happy birthday?</p> <p>17 A. As long as it took to hand me the</p> <p>18 camera.</p> <p>19 Q. So can you tell me approximately how</p> <p>20 long that took? Is it more than a minute?</p> <p>21 A. Five to 10 seconds.</p> <p>22 Q. And there were no other words spoken?</p> <p>23 A. Not that I remember.</p> <p>24 Q. In your recollection, were all of the</p> <p>25 Flynns aware that it was a video being taken</p>	<p style="text-align: right;">Page 44</p> <p>1 Q. Why was your mom not in the video if she</p> <p>2 wasn't taking it and she was right there?</p> <p>3 A. I don't know.</p> <p>4 Q. How did they end up getting in a line?</p> <p>5 And by "they," I mean the Flynn family. How did</p> <p>6 they end up in a line?</p> <p>7 A. I don't understand the question.</p> <p>8 Q. For the video, the Flynn family is</p> <p>9 standing in a line. I am asking you: How did</p> <p>10 that happen?</p> <p>11 A. They were posing for a video.</p> <p>12 Q. But they moved from one backyard to</p> <p>13 another. Right? For this video?</p> <p>14 MR. BISS: Object to the form.</p> <p>15 THE WITNESS: I don't remember.</p> <p>16 BY MS. CHERNER:</p> <p>17 Q. There was a party going on for July 4th.</p> <p>18 Right?</p> <p>19 A. Yes.</p> <p>20 Q. Okay. And everyone from the party</p> <p>21 wasn't in the same area as where the video is</p> <p>22 taken. Right?</p> <p>23 MR. BISS: Object to the form.</p> <p>24 THE WITNESS: I'm sorry. What? I</p> <p>25 don't understand.</p>
<p style="text-align: right;">Page 43</p> <p>1 instead of a photo?</p> <p>2 MR. SESSIONS: Objection. Form.</p> <p>3 THE WITNESS: I don't know.</p> <p>4 BY MS. CHERNER:</p> <p>5 Q. Why was it just the Flynns in the</p> <p>6 video?</p> <p>7 MR. BISS: Object to the form.</p> <p>8 THE WITNESS: I mean they are the</p> <p>9 only ones there.</p> <p>10 BY MS. CHERNER:</p> <p>11 Q. You and your mom were right there, too.</p> <p>12 Why were you not in the video?</p> <p>13 A. Because I am there to take the video.</p> <p>14 Q. Okay. But your mom wasn't taking the</p> <p>15 video. Right?</p> <p>16 A. Yes.</p> <p>17 Q. And she wasn't in the video?</p> <p>18 A. May I see the video, please?</p> <p>19 Q. Please answer my questions.</p> <p>20 MR. SESSIONS: If you know,</p> <p>21 answer the question. If you don't know, tell</p> <p>22 her.</p> <p>23 THE WITNESS: Can you repeat the</p> <p>24 question, please?</p> <p>25 BY MS. CHERNER:</p>	<p style="text-align: right;">Page 45</p> <p>1 BY MS. CHERNER:</p> <p>2 Q. Was the video taken in front of all of</p> <p>3 the attendees of the July 4th, 2020, party?</p> <p>4 A. No.</p> <p>5 Q. Okay. So that's what I am asking.</p> <p>6 How -- how did it come to be that there was a</p> <p>7 video taken separately from the rest of the party</p> <p>8 that they were hosting?</p> <p>9 A. It was after the party.</p> <p>10 Q. You are saying there was no one else</p> <p>11 left at the house?</p> <p>12 MR. SESSIONS: Objection. Form.</p> <p>13 THE WITNESS: I don't remember.</p> <p>14 BY MS. CHERNER:</p> <p>15 Q. Okay. So you don't recall if it was</p> <p>16 after the party?</p> <p>17 MR. SESSIONS: Objection. Form.</p> <p>18 THE WITNESS: Can you restate the</p> <p>19 question?</p> <p>20 BY MS. CHERNER:</p> <p>21 Q. Yes. So from your -- from your</p> <p>22 recollection, what time was the video filmed?</p> <p>23 A. I know it was dark.</p> <p>24 Q. Which yard was the video filmed in?</p> <p>25 A. I don't remember.</p>

<p style="text-align: right;">Page 46</p> <p>1 MS. CHERNER: Okay. I am going to</p> <p>2 mark Tab 1, which is Flynn 135, as</p> <p>3 "Exhibit 390."</p> <p>4 (Deposition Exhibit Number 390 is</p> <p>5 marked.)</p> <p>6 MR. BISS: Lindsey, are these</p> <p>7 documents going to be put up on the Exhibit</p> <p>8 Share?</p> <p>9 MS. CHERNER: Yes, they are. And</p> <p>10 they will also be screen shared.</p> <p>11 MR. TOTH: It's in the Marked</p> <p>12 Exhibits folder now, and I will share it.</p> <p>13 (Deposition Exhibit Number 390, a</p> <p>14 video, plays.)</p> <p>15 BY MS. CHERNER:</p> <p>16 Q. You recall taking that video. Right?</p> <p>17 A. Yes.</p> <p>18 Q. You just heard the video in full, and</p> <p>19 the friends don't say, "Happy birthday, America"?</p> <p>20 Do they?</p> <p>21 MR. BISS: Lindsey, you listened to</p> <p>22 it, too. Why are you asking him that question?</p> <p>23 You know they didn't say that.</p> <p>24 BY MS. CHERNER:</p> <p>25 Q. Answer the question.</p>	<p style="text-align: right;">Page 48</p> <p>1 line?</p> <p>2 A. No.</p> <p>3 Q. Were the Flynnns all together before the</p> <p>4 video started, or were some Flynnns in another</p> <p>5 yard or somewhere else or wherever they may have</p> <p>6 been?</p> <p>7 MR. SESSIONS: Objection. Form.</p> <p>8 THE WITNESS: I don't remember</p> <p>9 where everyone was when.</p> <p>10 BY MS. CHERNER:</p> <p>11 Q. Did some Flynnns have to come over to the</p> <p>12 yard that you were in to record the video?</p> <p>13 A. No.</p> <p>14 Q. So by the time that you had the phone,</p> <p>15 everyone was already there?</p> <p>16 A. Yes.</p> <p>17 Q. Were you specifically asked to come over</p> <p>18 to that yard to record the video?</p> <p>19 A. No.</p> <p>20 Q. Okay. So then how did you end up in the</p> <p>21 yard?</p> <p>22 MR. SESSIONS: Objection. Form.</p> <p>23 THE WITNESS: I don't understand</p> <p>24 the question.</p> <p>25 BY MS. CHERNER:</p>
<p style="text-align: right;">Page 47</p> <p>1 MR. SESSIONS: I'm going to object</p> <p>2 to -- I'm going to object to the form of the</p> <p>3 question as being argumentative.</p> <p>4 BY MS. CHERNER:</p> <p>5 Q. Mr. Powell, do the Flynnns say, "Happy</p> <p>6 birthday," in the video?</p> <p>7 A. No.</p> <p>8 Q. Now that you have seen the video do you</p> <p>9 have any recollection of approximately what time</p> <p>10 it was taken?</p> <p>11 A. Not -- I mean around dark.</p> <p>12 Q. Okay. Who made the decision to move to</p> <p>13 that area of the yard to take the video?</p> <p>14 MR. SESSIONS: Objection. Form.</p> <p>15 THE WITNESS: I don't know.</p> <p>16 BY MS. CHERNER:</p> <p>17 Q. Who asked the Flynnns to get in a line?</p> <p>18 MR. BISS: Object to the form.</p> <p>19 THE WITNESS: I don't think that</p> <p>20 was a request.</p> <p>21 BY MS. CHERNER:</p> <p>22 Q. So when you were asked to take the</p> <p>23 video, were the Flynnns already in a line?</p> <p>24 A. I can't remember.</p> <p>25 Q. But you didn't ask them to get in a</p>	<p style="text-align: right;">Page 49</p> <p>1 Q. How did you end up in the same yard as</p> <p>2 the six Flynnn family members and your mom?</p> <p>3 MR. SESSIONS: Same objection.</p> <p>4 THE WITNESS: Because I was still</p> <p>5 with them at the time.</p> <p>6 BY MS. CHERNER:</p> <p>7 Q. So was there a conversation that led you</p> <p>8 to the other yard?</p> <p>9 MR. SESSIONS: Objection. Form.</p> <p>10 THE WITNESS: Not that I remember.</p> <p>11 BY MS. CHERNER:</p> <p>12 Q. The video was taken in General Flynn's</p> <p>13 yard. Right?</p> <p>14 A. I think so.</p> <p>15 Q. Did General Flynn tell everyone that he</p> <p>16 would be reading from his phone?</p> <p>17 A. No.</p> <p>18 Q. Were you surprised that he was reading</p> <p>19 from his phone?</p> <p>20 A. No.</p> <p>21 Q. Why not?</p> <p>22 A. I don't understand why, like, I would</p> <p>23 be.</p> <p>24 Q. Well, you testified that they were</p> <p>25 trying to wish the Flynnn family a happy birthday.</p>

<p style="text-align: right;">Page 50</p> <p>1 So, I'm just wondering: Was it surprising to 2 you that they had to read something from their 3 phone? 4 MR. SESSIONS: Objection. I 5 believe you misspoke. You mean not the Flynn's 6 but country. Is that correct, Counsel? 7 MS. CHERNER: Yes. 8 MR. SESSIONS: I will ask you to 9 rephrase your question. I think you misspoke. 10 BY MS. CHERNER: 11 Q. You testified earlier that the Flynn's 12 were trying to wish their country a happy 13 birthday. Right? 14 A. Yes. 15 Q. So if they were trying to wish their 16 country a happy birthday, were you surprised that 17 General Flynn was reading something from his 18 phone to do that? 19 A. I don't see why that would be relevant, 20 but no. 21 Q. That wasn't the question. I am just 22 asking if you were surprised. 23 A. No. 24 Q. Did he say in advance what he was 25 reading from his phone?</p>	<p style="text-align: right;">Page 52</p> <p>1 Q. So General Flynn specifically said, "We 2 want to wish the country a happy birthday on July 3 4th. Repeat after me"? 4 A. No. 5 Q. So then, what did he say? 6 A. I don't remember exactly. 7 Q. Okay. Well, was there -- you practiced 8 the video. Right? 9 A. No. Not really. 10 Q. What do you mean, "No. Not really"? 11 A. I think there were like two takes. 12 Those were "repeat after me," and they did it 13 again. 14 Q. The video that we just watched, was that 15 the first take or the second take? 16 A. I don't remember. I don't know. 17 Q. Where is the second version of the 18 video? 19 MR. BISS: Object to the form. 20 THE WITNESS: I don't know. 21 BY MS. CHERNER: 22 Q. So why was there a second take? What 23 happened after the first take that required a 24 second take? 25 MR. BISS: Object to the form.</p>
<p style="text-align: right;">Page 51</p> <p>1 A. I can't remember. 2 Q. So how did you get this video to happen? 3 The Flynn's are -- are they practicing what they 4 are going to say before they say it? 5 MR. SESSIONS: Objection. 6 Compound. 7 THE WITNESS: I think it was more 8 like a repeat-after-me thing. 9 BY MS. CHERNER: 10 Q. So who said to repeat after me? 11 A. I believe it was Mike. 12 Q. So he said that before the video 13 started? 14 A. Yes. 15 Q. What else did he say before the video 16 started? 17 A. When? 18 Q. When you were in the yard before you had 19 the phone or right after you got the phone. What 20 else was said other than "repeat after me"? 21 MR. SESSIONS: Objection. Form. 22 THE WITNESS: "Happy birthday." We 23 wanted to wish the country a happy birthday on 24 July 4th. 25 BY MS. CHERNER:</p>	<p style="text-align: right;">Page 53</p> <p>1 THE WITNESS: I think somebody 2 thought they could state the Constitution a 3 little bit better. 4 BY MS. CHERNER: 5 Q. Who? 6 A. I don't know. I can't remember. 7 Q. I am not sure what that means by, 8 "Someone thought they could state the 9 Constitution a little better." 10 A. So whatever Mike read on his phone, I 11 think someone said they could resay it better. 12 So they did a second take of the video. 13 Q. Who was that person? 14 A. I don't remember. 15 Q. It wasn't General Flynn? It was 16 somebody else? 17 A. I don't remember. 18 Q. So who asked for the second take? 19 A. I don't remember. 20 MR. SESSIONS: Counsel, at the 21 hour, we would like to take a break. We will 22 have been going about an hour. 23 MS. CHERNER: Yeah. Just give me 24 about one or two more minutes. 25 MR. SESSIONS: You take a break</p>

<p style="text-align: right;">Page 54</p> <p>1 whenever you are ready. I am just noting we are 2 around the one-hour mark, please. 3 MS. CHERNER: Yes. Absolutely. 4 BY MS. CHERNER: 5 Q. Was the first video the full video? 6 A. It was the same video as the second 7 pretty much. 8 Q. What were the differences between the 9 two videos? 10 A. People repeated what Mike read off of 11 his phone better the second time. 12 Q. What do you mean by that? "Better"? 13 A. They were more satisfied with how it 14 looked, I guess. 15 MS. CHERNER: Okay. We can take a 16 break now. 17 MR. SESSIONS: Thank you. About 18 five minutes? 19 MS. CHERNER: Five minutes is fine. 20 THE VIDEOGRAPHER: Current time is 21 9:57 a.m. We are now off of the record. 22 (Recess taken.) 23 THE VIDEOGRAPHER: Current time is 24 10:09 a.m. We are now back on the record. 25 BY MS. CHERNER:</p>	<p style="text-align: right;">Page 56</p> <p>1 THE WITNESS: I have seen people 2 mention it on July 4th. 3 BY MS. CHERNER: 4 Q. Specifically July 4th, 2020, or was 5 there another time? 6 A. July 4th, 2020. 7 Q. Oh, okay. So you mentioned that there 8 was a second video that was taken. We have only 9 received one video. Do you know where that 10 second video is? 11 A. No. 12 Q. Who would know where that second video 13 is? 14 MR. BISS: Object to the form. 15 THE WITNESS: I don't know. 16 BY MS. CHERNER: 17 Q. Okay. Were you aware that General Flynn 18 posted the oath video online as part of the Take 19 the Oath social media movement? 20 A. At what point? 21 Q. On July 4th, 2020. Don't -- 22 MR. SESSIONS: She is asking 23 about -- are you asking about a particular point 24 in time? 25 I think the witness is confused</p>
<p style="text-align: right;">Page 55</p> <p>1 Q. Mr. Powell, do you know what 2 General Flynn was reading on his phone? 3 A. I don't know the answer to these 4 questions. 5 Q. I just asked one question. So do you 6 know what he was reading on his phone? 7 A. I think we established already that it 8 was some sort of oath of office. 9 Q. Okay. But did he say where he was 10 reading it from, if it was a website or a note on 11 his phone? 12 A. No. I don't know. 13 Q. Okay. Had you ever heard the 14 Constitutional Oath of Office being used to wish 15 the country happy birthday? 16 A. Yes. 17 Q. When? 18 A. I think generally people think the Oath 19 of Office is something patriotic. So... 20 Q. The Constitutional Oath of Office is to 21 enter an office. So, I am just wondering how 22 or -- how you have seen it used for happy 23 birthday. 24 MR. BISS: He just told you. He 25 just told you that.</p>	<p style="text-align: right;">Page 57</p> <p>1 about the when he knew that. So, if you can 2 specify that, it will help him. That's why the 3 quizzical look on his face. 4 MS. CHERNER: Okay. Yeah. 5 BY MS. CHERNER: 6 Q. Mr. Powell, if in the future if you have 7 a question about my question please ask me, and I 8 am happy to clarify it for you. 9 Were you aware that General Flynn 10 planned to post the video that was taken that 11 evening as part of the Take the Oath social media 12 movement on July 4th, 2020? 13 MR. BISS: Objection to form. 14 BY MS. CHERNER: 15 Q. Please answer the yes or no. 16 A. No. 17 Q. You were not aware? 18 A. No. 19 Q. Did you become aware that General Flynn 20 did post the oath video as part of the social 21 media movement, Take the Oath? 22 A. Yes. 23 MR. BISS: Objection. Form. 24 THE WITNESS: Just now. 25 BY MS. CHERNER:</p>

<p style="text-align: right;">Page 58</p> <p>1 Q. What do you mean by "just now"?</p> <p>2 MR. FLYNN: You just mentioned it.</p> <p>3 BY MS. CHERNER:</p> <p>4 Q. You became aware during this</p> <p>5 deposition?</p> <p>6 A. Yes.</p> <p>7 MS. CHERNER: Okay. I am going to</p> <p>8 mark Tab 13, which was produced as PX_250, as</p> <p>9 "Exhibit 391."</p> <p>10 (Deposition Exhibit Number 391 is</p> <p>11 marked.)</p> <p>12 MR. FLYNN: I don't think she knows</p> <p>13 she is on.</p> <p>14 MR. BISS: Lindsey, will</p> <p>15 you -- Lindsey, will you make sure that these</p> <p>16 documents are posted on the Exhibit Share? I am</p> <p>17 not seeing them.</p> <p>18 MS. CHERNER: Yes. You may have to</p> <p>19 refresh.</p> <p>20 MR. BISS: I have refreshed.</p> <p>21 MR. SESSIONS: We are not -- we are</p> <p>22 not seeing them either.</p> <p>23 MR. BISS: Yeah. I --</p> <p>24 MR. SESSIONS: Not seeing this</p> <p>25 particular exhibit.</p>	<p style="text-align: right;">Page 60</p> <p>1 they are standing in the same line. So unless</p> <p>2 this is the second version, it would be the same</p> <p>3 video. Right?</p> <p>4 MR. SESSIONS: Objection. Calls</p> <p>5 for speculation.</p> <p>6 THE WITNESS: I don't know.</p> <p>7 BY MS. CHERNER:</p> <p>8 Q. Okay. Will you take a look at the top</p> <p>9 of that text? Sorry. The top of the Tweet?</p> <p>10 A. Uh-huh. Yes.</p> <p>11 Q. Do you see it says, "#TakeTheOath"?</p> <p>12 A. Yes.</p> <p>13 Q. Does that refresh your recollection that</p> <p>14 it was posted as part of "#TakeTheOath"?</p> <p>15 A. No.</p> <p>16 MR. BISS: Objection to form.</p> <p>17 MR. SESSIONS: Objection.</p> <p>18 Objection. Form.</p> <p>19 THE WITNESS: I see -- I see what</p> <p>20 you have in front of me. Yes.</p> <p>21 BY MS. CHERNER:</p> <p>22 Q. Okay. So General Flynn posted this at</p> <p>23 6:39 p.m. Does this at all refresh your</p> <p>24 recollection as to when approximately the video</p> <p>25 may have been taken that night?</p>
<p style="text-align: right;">Page 59</p> <p>1 THE DOCUMENT TECHNICIAN: It should</p> <p>2 be there now.</p> <p>3 MR. BISS: Okay.</p> <p>4 MR. SESSIONS: It is not.</p> <p>5 THE DOCUMENT TECHNICIAN: Try</p> <p>6 refreshing again.</p> <p>7 MS. CHERNER: I see it in there, so</p> <p>8 please refresh.</p> <p>9 MR. SESSIONS: I can't do that.</p> <p>10 Here we go. It's up now.</p> <p>11 BY MS. CHERNER:</p> <p>12 Q. Mr. Powell, as you can see, this is a</p> <p>13 General Flynn Tweet. On the bottom left corner,</p> <p>14 you can see the time is 6:39 p.m., 4 July 2020.</p> <p>15 Do you see that?</p> <p>16 A. Yes.</p> <p>17 Q. Okay. So General Flynn did post this</p> <p>18 video on July 4th, 2020. Right?</p> <p>19 A. Yes.</p> <p>20 Q. This is the same video that we watched</p> <p>21 as Exhibit 390. Right?</p> <p>22 MR. SESSIONS: If you know.</p> <p>23 THE WITNESS: I don't know.</p> <p>24 BY MS. CHERNER:</p> <p>25 Q. Okay. Well, it's a 42-second video and</p>	<p style="text-align: right;">Page 61</p> <p>1 MR. SESSIONS: Objection. Form.</p> <p>2 Speculation.</p> <p>3 You have not established if it</p> <p>4 refreshes his recollection.</p> <p>5 BY MS. CHERNER:</p> <p>6 Q. Okay. You can answer the question,</p> <p>7 Mr. Powell.</p> <p>8 A. I think it would still be around the</p> <p>9 same time as I previously stated.</p> <p>10 Q. Okay. How did General Flynn get this</p> <p>11 video on July 4th, 2020?</p> <p>12 MR. BISS: Object to the form.</p> <p>13 (Audio disturbance.)</p> <p>14 MR. BISS: Hold on one second.</p> <p>15 Hold on one second. I can hear somebody. And I</p> <p>16 don't know who it is yet. I am listening very</p> <p>17 closely, and I can hear somebody talking in the</p> <p>18 background. Okay?</p> <p>19 I don't know who it is. But</p> <p>20 whoever it is, stop talking in the background.</p> <p>21 It's interfering with my ability to listen to the</p> <p>22 deponent's testimony. And I can almost make out</p> <p>23 some of the whispers. Stop talking in the</p> <p>24 background.</p> <p>25 MS. BOLGER: For the record, just</p>

<p style="text-align: right;">Page 62</p> <p>1 in case there is any implication that it was 2 Counsel for Defense, I am alone in a hotel room 3 in Quebec, and I assure you I have no one to talk 4 to. 5 MS. CHERNER: Okay. 6 MR. BISS: Well, and I -- and I 7 didn't recognize it as your voice, Kate. And I 8 am sorry that you are locked up all alone in 9 Quebec. It's a horrible place to be locked up 10 in. 11 MS. CHERNER: Okay. Mr. Biss, 12 state your objection. 13 MR. SESSIONS: Pardon me. 14 MS. CHERNER: We are moving on. 15 MR. SESSIONS: Pardon me. For the 16 record, there is only two of us in this room, the 17 witness and myself. We don't know who it is that 18 was doing the whispering. 19 MR. BISS: Right. And 20 Mr. Sessions, that's a good point actually. It 21 didn't sound like a male's voice but as -- as you 22 may know, there are other participants on the 23 line remotely listening to the deposition. 24 So, I just want to make it clear 25 going forward, you know, keep quiet. Let's let</p>	<p style="text-align: right;">Page 64</p> <p>1 BY MS. CHERNER: 2 Q. You testified earlier that the video was 3 recorded on Sidney Powell's phone? Right? 4 A. Yes. I believe it was. 5 Q. Okay. How did the video get from 6 Sidney Powell's phone to General Flynn? 7 A. I don't know. 8 Q. Who would know? 9 MR. BISS: Object to the form. 10 THE WITNESS: I don't know. 11 BY MS. CHERNER: 12 Q. Did you send the video to General Flynn? 13 A. No. 14 Q. Did anyone else film the video besides 15 you? 16 A. No. 17 Q. And was it filmed on any other phone 18 besides Sidney Powell's phone? 19 A. No. 20 Q. Do you recall if General Flynn asked you 21 to send the video immediately after it was 22 taken? 23 A. No. It wasn't -- no. He didn't ask me 24 to do that. 25 Q. Did anyone ask you to send the video</p>
<p style="text-align: right;">Page 63</p> <p>1 the deponent testify. 2 MR. HOLMES: Look, I'm -- this is 3 Bob Holmes. I am muted. Nobody else is in here 4 with me. 5 MS. CHERNER: Okay. We are going 6 to go off the record. 7 MR. HOLMES: And everybody needs to 8 mute except the people that are involved in the 9 discussion. Okay? 10 Depositions that aren't conducted 11 that way are not conducted properly. So, the 12 concierge needs to advise everybody to mute 13 themselves so none of us have to put up with some 14 crap that somebody else is throwing out. Make 15 this thing easy, guys. 16 MS. CHERNER: Okay. We are going 17 to go off the record if everyone keeps talking. 18 Let's move on. Everybody mute yourself except me 19 and Wilson. 20 BY MS. CHERNER: 21 Q. Mr. Powell, how did General Flynn get 22 this video before 6:39 p.m. on July 4th, 2020? 23 MR. BISS: Object to the form. 24 THE WITNESS: Previously it was 25 recorded on the phone.</p>	<p style="text-align: right;">Page 65</p> <p>1 after it was taken? 2 A. No. 3 Q. After taking the July 4th, 2020, videos, 4 what happened next? 5 A. Went back to the hotel. 6 Q. Immediately after the July 4th, 2020, 7 videos, you went back; or was there some amount 8 of time before that? 9 A. I can't recall how long. I don't 10 remember how long. 11 Q. Is your testimony that there was some 12 amount of time before you went back to the hotel 13 after the video was taken? 14 A. Yes. 15 Q. Okay. You just don't recall how long? 16 A. Correct. 17 Q. Okay. Were you aware on July 4th, 2020, 18 that the video was posted? 19 A. I can't remember. 20 Q. Okay. Your mom is tagged in 21 Exhibit 391, if you look on the screen; right? 22 A. Yes. 23 Q. So was she aware that night? 24 MR. BISS: Object to the form. 25 Speculation.</p>

<p style="text-align: right;">Page 66</p> <p>1 THE WITNESS: I don't know. I</p> <p>2 mean, I don't know.</p> <p>3 BY MS. CHERNER:</p> <p>4 Q. You have no recollection of having a</p> <p>5 conversation with your mom or with any of the</p> <p>6 Flynns about it being posted on July 4th, 2020?</p> <p>7 A. No. I don't have an answer to a lot of</p> <p>8 these questions. It was a really impromptu thing</p> <p>9 and the video is just an impromptu thing to wish</p> <p>10 America happy birthday on July 4th.</p> <p>11 Q. The video was filmed twice. Right?</p> <p>12 A. I believe so. Yes.</p> <p>13 Q. Yes. Okay. Do you recall the Flynns</p> <p>14 doing a toast to your mom?</p> <p>15 A. No.</p> <p>16 MS. CHERNER: I am going to mark</p> <p>17 Tab 2, which was produced as PX_189, as</p> <p>18 "Exhibit 392" in this deposition.</p> <p>19 (Deposition Exhibit Number 392, a</p> <p>20 video, is marked and plays.)</p> <p>21 BY MS. CHERNER:</p> <p>22 Q. In that video, you heard your mom</p> <p>23 being called "the Guardian Angel of Justice"?</p> <p>24 Right?</p> <p>25 A. Yes.</p>	<p style="text-align: right;">Page 68</p> <p>1 see that?</p> <p>2 A. I don't see that part. It's cut off on</p> <p>3 the...</p> <p>4 Q. Okay. I can represent to you that</p> <p>5 that's the time on it. Can you see it now?</p> <p>6 A. Can you repeat the time, please?</p> <p>7 Q. 6:37 p.m.</p> <p>8 A. Yes.</p> <p>9 Q. Okay. He says, "I'll send you a few</p> <p>10 e-mails with photos and a few videos. Sending</p> <p>11 all at once won't work."</p> <p>12 Did he send you a few videos?</p> <p>13 A. I recall one video.</p> <p>14 Q. And what video was that?</p> <p>15 A. It was my dog swimming in the pool.</p> <p>16 Q. Were there any other videos?</p> <p>17 A. Not that I remember, no.</p> <p>18 Q. Okay.</p> <p>19 A. That's my dog.</p> <p>20 Q. That's a cute dog. After July 4th,</p> <p>21 2020, what was your relationship like with</p> <p>22 Jack Flynn?</p> <p>23 MR. BISS: Object to the form.</p> <p>24 THE WITNESS: I don't even remember</p> <p>25 speaking to him after that.</p>
<p style="text-align: right;">Page 67</p> <p>1 Q. Does that refresh your recollection that</p> <p>2 there was a toast to your mom after the July 4th,</p> <p>3 2020 videos were taken?</p> <p>4 A. I don't know if that was before or</p> <p>5 after. But yes, the same night.</p> <p>6 Q. Okay. At the end, you heard Joe Flynn</p> <p>7 say it's going to go viral. Right?</p> <p>8 A. Yes.</p> <p>9 Q. General Flynn also sent you some photos</p> <p>10 after the July 4th weekend. Is that correct?</p> <p>11 A. I think he sent me a video.</p> <p>12 MS. CHERNER: Okay. Can we mark</p> <p>13 Tab 18, which was produced to us by you, Wilson,</p> <p>14 with WBP_CNN_770 as "Exhibit 393"?</p> <p>15 And if you could zoom in on the top</p> <p>16 of the e-mail in the one sentence there?</p> <p>17 (Deposition Exhibit Number 393 is</p> <p>18 marked.)</p> <p>19 BY MS. CHERNER:</p> <p>20 Q. Wilson, are you able to see that?</p> <p>21 A. Yes.</p> <p>22 Q. Okay. So General Flynn sends an e-mail</p> <p>23 to -- this is your e-mail. Right?</p> <p>24 A. Yes.</p> <p>25 Q. On July 8th, 2020, at 6:37 p.m. Do you</p>	<p style="text-align: right;">Page 69</p> <p>1 BY MS. CHERNER:</p> <p>2 Q. You never spoke to him again?</p> <p>3 A. Not that I remember, no.</p> <p>4 Q. Did he ever reach out to you for the</p> <p>5 videos that were taken on July 4th, 2020?</p> <p>6 A. I think -- I think his wife reached out</p> <p>7 to me, but I don't think he did. And this was</p> <p>8 also produced.</p> <p>9 Q. Did you communicate with Leslie Flynn</p> <p>10 after July 4th, 2020, other than the message that</p> <p>11 you are referencing?</p> <p>12 A. Can I see the message? Can I show you</p> <p>13 which message I am referring to?</p> <p>14 Q. I will show you a message when I want</p> <p>15 to show you a message. I am just asking for</p> <p>16 your recollection. Did you communicate with her</p> <p>17 other than that message that you are referring</p> <p>18 to?</p> <p>19 A. I don't remember.</p> <p>20 Q. Okay.</p> <p>21 A. I mean...</p> <p>22 MS. CHERNER: Can we mark Tab 31,</p> <p>23 which was produced as WBP_CNN_941 to 942, as</p> <p>24 "Exhibit 394"?</p> <p>25 (Deposition Exhibit 394 is marked.)</p>


<p style="text-align: right;">Page 70</p> <p>1 BY MS. CHERNER:</p> <p>2 Q. Mr. Powell, can you see the message on</p> <p>3 your screen?</p> <p>4 A. Yes.</p> <p>5 Q. Okay. Is this the message that you were</p> <p>6 just referring to? We can zoom in.</p> <p>7 A. No. There was one later that I was</p> <p>8 referring to.</p> <p>9 Q. Okay. I have a couple of questions</p> <p>10 about this exhibit for you. So is this --</p> <p>11 this is a Facebook Messenger message. Is that</p> <p>12 right?</p> <p>13 A. I don't know.</p> <p>14 Q. Well, it doesn't look like a text.</p> <p>15 Right?</p> <p>16 A. Correct. I don't think it's a text.</p> <p>17 Q. It's from a social media messaging</p> <p>18 platform of some kind, and you are not sure if</p> <p>19 it's Facebook or a different one?</p> <p>20 A. Yes.</p> <p>21 Q. On February 22nd, 2021, Leslie Flynn</p> <p>22 forwarded a link that we cannot see, and it was</p> <p>23 from YouTube. Do you know what that is?</p> <p>24 A. No.</p> <p>25 Q. Do you know if you would have looked at</p>	<p style="text-align: right;">Page 72</p> <p>1 the message chain but not this message.</p> <p>2 Q. Okay. So did Jack reach out to you for</p> <p>3 the video that Leslie noted here?</p> <p>4 MR. BISS: Object to the form.</p> <p>5 That's not what it says.</p> <p>6 THE WITNESS: I don't think so, but</p> <p>7 I can't remember.</p> <p>8 BY MS. CHERNER:</p> <p>9 Q. Okay. Did any of the other Flynn's reach</p> <p>10 out to you for the original videos, or was it</p> <p>11 just Leslie here in this message?</p> <p>12 A. I only remember Leslie reaching out.</p> <p>13 Q. Do you know why she was reaching out to</p> <p>14 you on April of 2021, nine months after the</p> <p>15 videos were taken?</p> <p>16 A. No.</p> <p>17 Q. Did you know which videos she was</p> <p>18 referring to?</p> <p>19 A. No.</p> <p>20 Q. How did you interpret "original videos</p> <p>21 of the 4th of July cookout"?</p> <p>22 A. Videos that were taken at the Fourth of</p> <p>23 July cookout.</p> <p>24 Q. Were there other videos taken besides</p> <p>25 the one that we watched?</p>
<p style="text-align: right;">Page 71</p> <p>1 the link?</p> <p>2 A. I don't remember.</p> <p>3 Q. Do you have a habit of clicking links</p> <p>4 when you receive them?</p> <p>5 A. Not necessarily.</p> <p>6 Q. So it's possible that you just received</p> <p>7 this link, and you didn't click it?</p> <p>8 MR. SESSIONS: Objection. Form.</p> <p>9 THE WITNESS: I can't remember. I</p> <p>10 don't know.</p> <p>11 BY MS. CHERNER:</p> <p>12 Q. Okay. Below, you see the beginning of a</p> <p>13 second message from Leslie. And we are going to</p> <p>14 have to go to the second page after we start this</p> <p>15 one. But this message is from April 11th, 2021.</p> <p>16 Do you see that?</p> <p>17 A. Yes.</p> <p>18 Q. Leslie says, "Hi Wilson, not sure if</p> <p>19 Jack has reached out to you yet but we are</p> <p>20 looking for the original videos of the 4th of</p> <p>21 July cookout at Mike's house."</p> <p>22 Is that the message that you were</p> <p>23 referencing earlier?</p> <p>24 A. No. There was a later -- it's the</p> <p>25 message with her but it's not this message. Like</p>	<p style="text-align: right;">Page 73</p> <p>1 A. As I stated earlier, there were two</p> <p>2 videos, I believe, of the video that you have</p> <p>3 mentioned.</p> <p>4 Q. There are two versions?</p> <p>5 A. As I said stated earlier, yes. I</p> <p>6 believe so.</p> <p>7 MS. CHERNER: Okay. I want to show</p> <p>8 the second page of that exhibit. Okay.</p> <p>9 BY MS. CHERNER:</p> <p>10 Q. So you respond --</p> <p>11 MS. CHERNER: Can you blow</p> <p>12 up -- can you make that bigger, please?</p> <p>13 BY MS. CHERNER:</p> <p>14 Q. You respond, "Oh gosh, not sure I have</p> <p>15 any. I'll ask M though. How are you all? We</p> <p>16 miss RI."</p> <p>17 RI is a reference to Rhode Island.</p> <p>18 Right?</p> <p>19 A. Yes.</p> <p>20 Q. And what does the "M" refer to?</p> <p>21 A. My mom.</p> <p>22 Q. Okay. Did you ever ask your mom?</p> <p>23 A. I can't remember.</p> <p>24 Q. In response, Leslie says, "I'm</p> <p>25 actually in FL, and Jack is in RI. We are all</p>

<p style="text-align: right;">Page 74</p> <p>1 good! Heading over to help Lori move in to her 2 new house in FL!! Haven't seen Mike and Lori 3 this happy for a very long time!!!! It's 4 wonderful to see! Hope all is well with you and 5 your Mom." 6 Do you see that message? 7 A. Yes. 8 Q. How did you interpret this? 9 MR. BISS: Object to the form. 10 THE WITNESS: I am glad that they 11 are happy. I am glad that Mike and Lori are 12 happy. 13 BY MS. CHERNER: 14 Q. It seems like Jack and Leslie were good 15 on April 11th, 2021. Right? 16 MR. BISS: Object to the form. 17 MR. SESSIONS: Object to the form. 18 THE WITNESS: I don't know. 19 BY MS. CHERNER: 20 Q. Well, it says, "We are all good!" 21 MR. SESSIONS: Is that a question? 22 BY MS. CHERNER: 23 Q. I am asking: Do you see it? It says, 24 "We are all good." It's a message from Leslie. 25 A. Yes, I see the message.</p>	<p style="text-align: right;">Page 76</p> <p>1 BY MS. CHERNER: 2 Q. Okay. What's your opinion of 3 Leslie Flynn? 4 MR. BISS: Object to the form. 5 THE WITNESS: I haven't gotten to 6 speak much with her. I don't really have -- I 7 don't know. 8 BY MS. CHERNER: 9 Q. You don't have a bad opinion of 10 Leslie Flynn? Do you? 11 A. No. 12 MR. BISS: Object to the form. 13 BY MS. CHERNER: 14 Q. What's your opinion of Lori Flynn? 15 MR. BISS: Object to the form. 16 BY MS. CHERNER: 17 Q. What's your opinion of Lori Flynn? 18 A. She seems like a very supporting wife to 19 Mr. Flynn. 20 Q. You don't have a bad opinion of 21 Lori Flynn. Do you? 22 A. I don't. 23 MR. BISS: Object to the form. 24 BY MS. CHERNER: 25 Q. What about Valerie Flynn? What's your</p>
<p style="text-align: right;">Page 75</p> <p>1 Q. Okay. And you said that she is saying, 2 "We are all good." Right? 3 A. Yes. 4 Q. And you see that she says, "Haven't seen 5 Mike and Lori this happy for a very long 6 time!!!!" Right? 7 A. Yes. 8 Q. Okay. Do you have any reason to doubt 9 that? 10 MR. BISS: Object to the form. 11 THE WITNESS: I don't know. I 12 don't talk to them very much and I didn't talk to 13 them very much at the time. 14 BY MS. CHERNER: 15 Q. Okay. What is your opinion of 16 Jack Flynn? 17 MR. BISS: Object to the form. 18 THE WITNESS: He does a really good 19 lobster cookout, but I didn't get a chance to 20 talk to him very much. 21 BY MS. CHERNER: 22 Q. Okay. Do you have any bad opinions of 23 Jack Flynn? 24 MR. BISS: Object to the form. 25 THE WITNESS: No.</p>	<p style="text-align: right;">Page 77</p> <p>1 opinion of her? 2 MR. BISS: Object to the form. 3 THE WITNESS: I didn't talk to her 4 very much either. I don't know her that well. 5 BY MS. CHERNER: 6 Q. Do you have a bad opinion of 7 Valerie Flynn? 8 MR. BISS: Object to the form. 9 THE WITNESS: No. 10 BY MS. CHERNER: 11 Q. Are you in close contact with your 12 mom? 13 A. Yes. 14 MS. CHERNER: Okay. I am going 15 take a five-minute break. 16 THE COURT REPORTER: Off of the 17 record. 18 (Recess taken.) 19 THE VIDEOGRAPHER: The time is 20 10:44 a.m. We are now back on the record. 21 BY MS. CHERNER: 22 Q. Mr. Powell, right before we took our 23 break, I asked you if you were in close contact 24 with your mom, and you said, "Yes." Right? 25 A. (No audible response.)</p>

<p style="text-align: right;">Page 78</p> <p>1 Q. I'm sorry. I couldn't hear your answer. 2 MS. CHERNER: It looks like he is 3 muted. 4 MR. BISS: Unmute it. 5 MS. CHERNER: Did you get that, 6 Court Reporter? 7 THE COURT REPORTER: No, I did not 8 hear either. It did sound as if he were muted. 9 MS. BOLGER: That's really weird. 10 I can hear him. It's Kate. Sorry. 11 MS. CHERNER: Oh. 12 MR. SESSIONS: We are not doing 13 anything with the audio except turning on or 14 turning off. 15 MS. CHERNER: I can hear 16 Mr. Sessions now. So, I'm just going to ask my 17 question again. Just -- I'm sorry. I couldn't 18 hear the response. 19 MR. SESSIONS: That's fine. 20 BY MS. CHERNER: 21 Q. Before we took a break, you said you 22 were in close contact with your mom. Is that 23 right? 24 A. Yes. 25 Q. Okay. I could hear it that time. Does</p>	<p style="text-align: right;">Page 80</p> <p>1 MR. HOLMES: Well -- 2 MR. SESSIONS: I'm -- I'm defending 3 it. If there is some connection with this case, 4 please let us know. 5 MS. CHERNER: I am happy to explain 6 the context of the question. We have tried -- 7 MR. SESSIONS: Please. 8 MS. CHERNER: -- to serve 9 Mrs. Powell for months, and so I am asking 10 because she is relevant to this litigation. 11 MR. SESSIONS: Okay. So we are 12 clear, we are not giving her address out. You 13 can take it up with her counsel about that. 14 We are not here to testify about 15 Ms. Powell or where she lives or what she owns or 16 doesn't own. 17 MR. SESSIONS: I will instruct the 18 witness not to answer the question as phrased. 19 BY MS. CHERNER: 20 Q. Mr. Powell, do you know whether your 21 mother is in Dallas right now? 22 A. I don't think she is. 23 Q. You don't know if she is in Dallas right 24 now? 25 A. I think she is not in Dallas. I haven't</p>
<p style="text-align: right;">Page 79</p> <p>1 your mom have more than one property? 2 MR. SESSIONS: What are we talking 3 about here? 4 MS. CHERNER: It's a "yes" or "no." 5 BY MS. CHERNER: 6 Q. Does she have more than one property? 7 MR. SESSIONS: I am objecting to 8 the form of the question. 9 MR. HOLMES: Wilson, this is 10 Bob Holmes, and I am objecting to you answering 11 one damn question about your mom. You are not 12 handling her business. You don't know what she 13 has. 14 And Lindsey, I think this is 15 completely off of the record, completely 16 irrelevant to this deposition, and I don't 17 know where the hell you think you are going with 18 it. 19 But he is not going to testify, and 20 you can take it up with the Court about 21 anything he knows about his mom's assets, 22 properties, where she lives, what she does or 23 what she doesn't do. Do you understand? 24 MS. CHERNER: Mr. Holmes, you are 25 not the one defending this deposition. Right?</p>	<p style="text-align: right;">Page 81</p> <p>1 seen her in several weeks. 2 Q. Where is she? 3 A. I don't know. 4 Q. You don't know what state she's in? 5 A. No. 6 Q. You testified earlier that you're 7 close -- you are in close contact with your mom? 8 Right? 9 A. Yes. 10 Q. But you don't know what state she is? 11 MR. SESSIONS: Objection. Asked 12 and answered. 13 THE WITNESS: I don't -- I don't 14 know where she is all the time. 15 BY MS. CHERNER: 16 Q. When was the last time you talked to 17 her? 18 A. Probably today. This morning. 19 Q. And she didn't mention where she was? 20 A. No. 21 Q. You didn't ask? 22 A. No. 23 MS. CHERNER: Okay. No further 24 questions. 25 MR. SESSIONS: We will reserve our</p>

<p style="text-align: right;">Page 82</p> <p>1 questions.</p> <p>2 EXAMINATION</p> <p>3 BY MR. BISS:</p> <p>4 Q. This is Steve Biss. I represent Jack</p> <p>5 and Leslie Flynn. Good morning, sir. I don't</p> <p>6 think we've ever met or talked before. Is that</p> <p>7 correct?</p> <p>8 A. Yes. I believe so.</p> <p>9 Q. All right. I have just a couple of</p> <p>10 questions. Okay? They are -- I want to follow</p> <p>11 up on the video that we marked for identification</p> <p>12 as "Exhibit 390."</p> <p>13 You told us that you are the one</p> <p>14 who took that video using your mom's phone.</p> <p>15 Correct?</p> <p>16 A. Yes.</p> <p>17 Q. Okay. Here is my question: When you</p> <p>18 watched the video today, when you recorded it,</p> <p>19 when you were in the backyard on July 4th, 2020,</p> <p>20 when you watched it again today, did you notice</p> <p>21 that there was a large American flag right behind</p> <p>22 General Flynn and his family members on the</p> <p>23 fence? Did you notice that?</p> <p>24 A. I wasn't looking specifically for that,</p> <p>25 but I definitely believe it was there.</p>	<p style="text-align: right;">Page 84</p> <p>1 MS. CHERNER: Object to the form.</p> <p>2 BY MR. BISS:</p> <p>3 Q. Did you associate the words "God bless</p> <p>4 America" with the happy birthday celebration of</p> <p>5 the Fourth of July?</p> <p>6 MS. CHERNER: Object to the form</p> <p>7 and calls for speculation.</p> <p>8 THE WITNESS: No. Not necessarily.</p> <p>9 BY MR. BISS:</p> <p>10 Q. What did you --- when the Flynn family</p> <p>11 members said, "God bless America," what did you</p> <p>12 interpret that to mean?</p> <p>13 What do you think they were -- what</p> <p>14 do you think they were getting at when they said,</p> <p>15 "God bless America"?</p> <p>16 MS. CHERNER: Object to the form.</p> <p>17 THE WITNESS: Well, if I were to</p> <p>18 interpret it personally, I would think that God's</p> <p>19 presence would be a great thing in this country</p> <p>20 right now.</p> <p>21 MR. BISS: Okay. Thank you, sir.</p> <p>22 No other questions.</p> <p>23 MS. CHERNER: Okay. Does -- if no</p> <p>24 one else has any other questions, then it seems</p> <p>25 like you are done here, Mr. Powell.</p>
<p style="text-align: right;">Page 83</p> <p>1 Q. All right. And do you recall any</p> <p>2 conversations that day when the video was being</p> <p>3 taken?</p> <p>4 Do you recall any conversations</p> <p>5 that the reason that everybody wanted to go to</p> <p>6 General Flynn's backyard is because he had a big</p> <p>7 American flag on the fence?</p> <p>8 MS. CHERNER: Objection. Form.</p> <p>9 BY MR. BISS:</p> <p>10 Q. Do you recall any conversations to that</p> <p>11 extent?</p> <p>12 MS. CHERNER: Object to the form.</p> <p>13 THE WITNESS: No. I don't recall</p> <p>14 that. I don't remember that specifically.</p> <p>15 BY MR. BISS:</p> <p>16 Q. All right, sir. And then my last</p> <p>17 question is: When you watched the video, when</p> <p>18 you took it, and when you watched it again today,</p> <p>19 you distinctly heard the Flynn family members</p> <p>20 say, "God bless America."</p> <p>21 And then there was some celebration</p> <p>22 afterwards and you heard some various, various</p> <p>23 different kinds of cheering.</p> <p>24 Do you remember that?</p> <p>25 A. Yes.</p>	<p style="text-align: right;">Page 85</p> <p>1 MR. SESSIONS: Thank you very much.</p> <p>2 May we be excused?</p> <p>3 MS. CHERNER: Yes.</p> <p>4 THE COURT REPORTER: I do have a</p> <p>5 couple of questions for spelling, but we can go</p> <p>6 off the record if you all would like.</p> <p>7 MR. BISS: Let's go off the record,</p> <p>8 Suzi.</p> <p>9 MS. CHERNER: Let's go off of the</p> <p>10 record, please. Thank you.</p> <p>11 THE VIDEOGRAPHER: Current time is</p> <p>12 10:51 a.m., and we are off the record.</p> <p>13 (Deposition concluded at</p> <p>14 10:51 a.m.)</p> <p>15</p> <p>16</p> <p>17</p> <p>18</p> <p>19</p> <p>20</p> <p>21</p> <p>22</p> <p>23</p> <p>24</p> <p>25</p>

Page 86	Page 88
1 CHANGES AND SIGNATURE	1 IN THE UNITED STATES DISTRICT COURT
2 TO THE REMOTE VIDEOTAPED ORAL DEPOSITION OF	2 SOUTHERN DISTRICT OF NEW YORK
3 WILSON POWELL	3 JOHN P. "JACK" FLYNN, §
4 May 6, 2023	3 et al, §
5 Page Line Change Reason	4 Plaintiffs, §
6 _____	5 vs. § Civil Action No.
7 _____	§ 1:21-CV-02587-GHW
8 _____	6 CABLE NEWS NETWORK, §
9 _____	7 INC., §
10 _____	8 Defendant. §
11 _____	9 REMOTE VIDEOTAPED ORAL DEPOSITION OF
12 _____	10 WILSON POWELL
13 _____	11 May 6, 2023
14 _____	12
15 _____	13 I, Suzanne Kelly, RDR, CRR, in and for the State
16 _____	13 of Texas hereby certify to the following:
17 _____	14 That the witness, WILSON POWELL, was duly sworn
18 _____	14 by the officer and that the transcript of the
19 _____	15 videotaped oral deposition is a true record of the
20 _____	15 testimony given by the witness;
21 _____	16 That the deposition transcript was submitted on
22 _____	17 the ____ day of _____, 2023, to the witness for
23 _____	17 examination, signature and return to Suzanne Kelly by
24 _____	18 the ____ day of _____, 2023;
25 _____	19 That the amount of time used by each party at the
	20 deposition is as follows:
	21 Ms. Cherner: One hour and 28 minutes used;
	21 Mr. Biss: Three minutes used;
	22 That pursuant to the information given to the
	23 deposition officer at the time said testimony was
	23 taken, the following includes counsel for all parties
	24 of record:
	25
Page 87	Page 89
1 I, WILSON POWELL, have read the foregoing	1 FOR THE PLAINTIFFS:
2 deposition and hereby affix my signature that same is	2 Steven S. Biss, Esq.
3 true and correct, except as noted above.	3 LAW OFFICE OF STEVEN S. BISS
4 _____	3 300 West Main Street
5 (Signature of witness)	4 Suite 102
6 STATE OF _____	4 Charlottesville, Virginia 22903
7 COUNTY OF _____	804.501.8272
8 Before me, _____, on this day	5 stevenbiss@earthlink.net
9 personally appeared WILSON POWELL, known to me (proved	6
10 to me under oath or through _____)	7 FOR THE DEFENDANT:
11 (description of identity card or other document) to be	7 Lindsey Cherner, Esq.
12 the person whose name is subscribed to the foregoing	8 Katherine M. Bolger, Esq.
13 instrument and acknowledged to me that he executed the	9 DAVIS WRIGHT TREMAINE, L.L.P.
14 same for the purposes and consideration therein	9 1251 Avenue of the Americas
15 expressed.	21st Floor
16 (Seal) Given under my hand and seal of office	10 New York, New York 10020
17 this ____ day of _____, 2023.	212.489.8230
18	11 lindseycherner@dwt.com
19	12
20	13 FOR THE WITNESS:
21	13 William L. "Lewis" Sessions, Esq.
22	14 MOORE GANSKE MURR SESSIONS, P.L.L.C.
23	15 15851 N. Dallas Parkway
24	15 Suite 180
25	16 Addison, Texas 75001
	214.217.8855
	lsessions@mgmspllc.com
	17
	18 Robert H. Holmes, Esq.
	19 THE HOLMES LAW FIRM, P.L.L.C.
	19 19 St. Laurent Place
	20 Dallas, Texas 75225
	214.384.3182
	rhholmes@swbell.net
	21
	22 I further certify that I am neither counsel for,
	23 related to, nor employed by any of the parties or
	23 attorneys in the action in which this proceeding was
	24 taken, and further that I am not financially or
	24 otherwise interested in the outcome of the action.
	25

<p style="text-align: right;">Page 90</p> <p>1 In witness whereof, I have this date subscribed my 2 name on this 8th day of May, 2023.</p> <p>3 </p> <p>4 Suzanne Kelly, CSR, RDR, CRR 5 Certification No. 1260 6 Expiration Date: 12-31-23 7 VERITEXT LEGAL SOLUTIONS 8 Firm Registration No. 571 9 300 Throckmorton Street 10 Suite 1600 11 Fort Worth, Texas 76102 12 817.336.3042 1.800.336.4000 13 14 15 16 17 18 19 20 21 22 23 24 25</p>	
<p style="text-align: right;">Page 91</p> <p>1 Robert Holmes, Esquire 2 rhholmes@swbell.net 3 May 8, 2023 4 RE: Flynn, John P. "Jack" Et Al v. Cable News Network Inc. 5 5/6/2023, Wilson Powell (#5871702) 6 The above-referenced transcript is available for 7 review. 8 Within the applicable timeframe, the witness should 9 read the testimony to verify its accuracy. If there are 10 any changes, the witness should note those with the 11 reason, on the attached Errata Sheet. 12 The witness should sign the Acknowledgment of 13 Deponent and Errata and return to the deposing attorney. 14 Copies should be sent to all counsel, and to Veritext at 15 cs-midatlantic@veritext.com 16 17 Return completed errata within 30 days from 18 receipt of testimony. 19 If the witness fails to do so within the time 20 allotted, the transcript may be used as if signed. 21 22 Yours, 23 Veritext Legal Solutions 24 25</p>	

[& - 75001]

Page 1

&	1:21 1:5 5:11	250 4:16 58:8	42:13 44:17
& 16:21	88:5	28 88:20	45:3 51:24
0	2	3	52:3 56:2,4,6
02587 1:5 5:11	2 4:3,18 66:17	30 91:17	56:21 57:12
88:5	2019 21:20	300 2:5 89:3	59:18 61:11
1	22:19	90:6	63:22 65:3,6
1 4:14 5:5	2020 20:16,19	31 4:23 69:22	65:17 66:6,10
16:18 46:2	20:20 21:15	390 4:14 46:3,4	67:2,10 68:20
1.800.336.40...	24:7,10,17,19	46:13 59:21	69:5,10 71:20
90:8	24:25 25:4,10	82:12	72:21 82:19
10 42:21	27:9,12 29:8	391 4:15 58:9	5
10020 2:12	31:1,8,24 36:4	58:10 65:21	5/6/2023 91:5
89:10	45:3 56:4,6,21	392 4:18 66:18	50 35:4
102 2:5 89:3	57:12 59:14,18	66:19	53 4:14,18
10:09 54:24	61:11 63:22	393 4:19 67:14	571 90:6
10:44 77:20	65:3,6,17 66:6	67:17	58 4:15
10:51 1:14	67:3,25 68:21	394 4:21 69:24	5871702 1:23
85:12,14	69:5,10 82:19	69:25	91:5
11th 71:15	2021 28:2	4	5:30 34:7
74:15	70:21 71:15	4 59:14	6
12-31-23 90:5	72:14 74:15	42 59:25	6 1:10,14 86:4
1251 2:11 89:9	2023 1:10,14	45 41:4	88:10
12567 90:3	5:4 86:4 87:17	46 4:14	66 4:18
1260 90:4	88:10,17,18	4th 20:16 21:15	67 4:19
13 4:16 58:8	90:191:3	24:7,10,25	69 4:21
135 46:2	212.489.8230	25:4,10,21	6:37 67:25 68:7
15851 2:18	2:13 89:10	26:14 27:5,6,9	6:39 59:14
89:14	214.217.8855	28:11 29:8,14	60:23 63:22
1600 90:7	2:19 89:16	30:4 31:1,3,5,8	6th 5:3
18 4:20 67:13	214.384.3182	31:12,24 32:13	7
180 2:18 89:15	2:23 89:20	32:17,20 34:12	7 4:5
189 4:18 66:17	21st 2:12 89:9	36:4 37:20	75001 2:19
19 2:22 89:19	22903 2:6 89:4	38:4,8,9,19,24	89:15
	22nd 70:21	41:23 42:6,8	

[75225 - assure]

Page 2

75225 2:23 89:19 76102 90:7 770 4:20 67:14	accounts 15:24 accuracy 91:9 accurate 40:23 accurately 36:22 acknowledged 87:13 acknowledg... 91:12 action 1:5 88:5 89:23,24 actually 62:20 73:25 addison 2:19 89:15 address 10:24 80:12 administer 6:6 admitted 41:5 advance 50:24 advise 63:12 affiliations 5:18 affirm 6:10 affix 87:2 ago 13:9 agreed 11:4 agreement 6:18 10:23 ahead 41:12 al 1:3 5:7 88:3 91:4 allotted 91:20 allow 41:8	america 46:19 66:10 83:20 84:4,11,15 american 82:21 83:7 americas 2:11 89:9 amount 65:7,12 88:19 angel 66:23 answer 7:24 8:11,13,20,25 9:5 30:8 38:7 38:15 40:12,15 40:17 41:1,7 43:19,21 46:25 55:3 57:15 61:6 66:7 78:1 80:18 answered 37:24 81:12 answering 79:10 answers 8:6 anymore 15:2 anyway 21:22 appearances 2:1 3:1 4:3 5:18 appeared 87:9 appearing 1:17 applicable 91:8 approximate 20:24	approximately 9:16 10:3 13:7 16:17 22:15 24:15 27:23 35:1,20 42:19 47:9 60:24 april 71:15 72:14 74:15 archie 3:3 5:12 area 44:21 47:13 argue 38:13 argumentative 38:12 39:8 47:3 arrive 30:25 31:3 34:4 arrived 31:5 asked 15:24 37:7,11,13,24 47:17,22 48:17 53:18 55:5 64:20 77:23 81:11 asking 8:10,13 22:7,7,8,9 28:23 38:20 44:9 45:5 46:22 50:22 56:22,23 69:15 74:23 80:9 assets 79:21 associate 84:3 assure 62:3
8			
8 91:3 804.501.8272 2:6 89:4 817.336.3042 90:8 82 4:6 86 4:7 88 4:8 8th 67:25 90:1			
9			
941 4:22 69:23 942 4:22 69:23 9:00 1:14 5:3 9:57 54:21			
a			
a.m. 1:14,14 5:3 54:21,24 77:20 85:12,14 ability 61:21 able 67:20 above 1:13 87:3 91:6 absolutely 54:3 account 13:2 13:18 14:4,8 14:11,13,15,17 14:19,21 15:1 15:3,6,8,10,12 15:14,16,18			

[attached - certified]

Page 3

attached 91:11 attendees 1:17 45:3 attorney 5:20 7:11,15,21 8:23 19:11 91:13 attorneys 89:23 audible 77:25 audio 61:13 78:13 available 91:6 avenue 2:11 89:9 aware 36:13 42:25 56:17 57:9,17,19 58:4 65:17,23	based 41:1 basically 13:24 17:2 basis 13:11 bates 4:16,18 4:20,22 began 41:20 beginning 5:19 71:12 behalf 5:24 believe 12:25 14:24 20:9,17 21:9,16 24:19 26:1,4,17,20,23 28:14 29:5 31:22 34:13 37:5,10 50:5 51:11 64:4 66:12 73:2,6 82:8,25 benefit 8:6 better 53:3,9 53:11 54:11,12 big 83:6 bigger 73:12 birthday 38:23 39:3 41:23 42:6,8,12,16 46:19 47:6 49:25 50:13,16 51:22,23 52:2 55:15,23 66:10 84:4 biss 2:4,4 4:6 5:25,25 6:18	6:23 10:17 21:21 23:11 32:7 37:23 38:5 41:21 43:7 44:14,23 46:6,21 47:18 52:19,25 55:24 56:14 57:13,23 58:14,20,23 59:3 60:16 61:12,14 62:6 62:11,19 63:23 64:9 65:24 68:23 72:4 74:9,16 75:10 75:17,24 76:4 76:12,15,23 77:2,8 78:4 82:3,4 83:9,15 84:2,9,21 85:7 88:21 89:2,2 bit 53:3 bless 83:20 84:3,11,15 blow 73:11 board 41:4 bob 63:3 79:10 bolger 2:10 5:23 40:25 41:10 61:25 78:9 89:8 book 31:19 booked 31:21 bottom 59:13	bowden 7:10 bp 11:23,24 break 9:2,3,6 53:21,25 54:16 77:15,23 78:21 breakfast 32:6 32:9 briefly 34:25 broad 33:1 business 23:1 23:17 79:12
c			
back 54:24 65:5,7,12 77:20 background 13:23 61:18,20 61:24 backyard 44:12 82:19 83:6 bad 75:22 76:9 76:20 77:6 barbara 28:9 34:13 barbara's 21:8 barbecue 29:8 34:5,12			c 5:1 cable 1:6 5:8 88:6 91:4 called 16:13 66:23 calls 60:4 84:7 camera 42:18 card 87:11 case 5:10 6:11 62:1 80:3 cases 6:21 cause 1:13 cdt 1:14 celebrate 29:13 celebration 83:21 84:4 cell 10:25 certificate 4:8 certification 90:4 certified 1:16 41:4

[certify - continued]

Page 4

certify 88:13 89:22	62:5,11,14 63:5,16,20	closely 61:17	completely 79:15,15
chain 72:1	64:1,11 66:3	clouhub 14:13 14:15	complies 6:8
chance 75:19	66:16,21 67:12	cnn 4:20,22,22 5:22,24 67:14	compound 30:6 51:6
change 86:5	67:19 69:1,22	69:23	computer 19:8
changes 4:7 86:1 91:10	70:1 71:11	come 22:12 29:11 31:16	concierge 63:12
charlottesville 2:6 21:23 89:4	72:8 73:7,9,11	37:21 45:6	concluded 85:13
cheering 83:23	73:13 74:13,19	48:11,17	conducted 63:10,11
cherner 2:10 4:5 5:21,21	74:22 75:14,21	communicate 12:4 13:4,14	confidential 4:17
6:16,24 7:2	76:1,8,13,16,24	14:4 23:21,24	confirm 11:1 28:25
11:6 18:25	77:5,10,14,21	25:3,18 26:18	confused 56:25
21:25 23:15	78:2,5,11,15,20	27:17,20 28:1	connection 7:12 80:3
30:7,24 32:4	79:4,5,24 80:5	30:11 69:9,16	connectivity 19:9
32:10 33:2	80:8,19 81:15	communicated 20:15 21:18	consideration 87:14
36:2,24 38:1,6	81:23 83:8,12	22:23 23:6,9	constitution 53:2,9
38:14 39:9	84:1,6,16,23	25:20,24 28:15	constitutional 36:14,16 55:14
40:1,14,20	85:3,9 88:20	28:18,25	55:20
41:18,24 43:4	89:7	communicating 12:9,14 13:8	contact 77:11 77:23 78:22
43:10,25 44:16	chose 36:13	13:16	81:7
45:1,14,20	christopher 3:3 5:12	communication 13:12 22:17	context 37:16 80:6
46:1,9,15,24	civil 1:5,19 88:5	27:24 28:4	continued 3:1
47:4,16,21	clarify 14:25 57:8	30:1	
48:10,25 49:6	clear 36:19 62:24 80:12	communicati... 23:16 33:7	
49:11 50:7,10	click 71:7	company 16:11 16:13	
51:9,25 52:21	clicking 71:3	completed 91:17	
53:4,23 54:3,4	client 40:15 41:16		
54:15,19,25	climbing 17:6 17:17		
56:3,16 57:4,5	close 77:11,23 78:22 81:7,7		
57:14,25 58:3			
58:7,18 59:7			
59:11,24 60:7			
60:21 61:5			

[conversation - doing]

Page 5

conversation 33:11,15 39:22 42:15 49:7 66:5 conversations 33:3 83:2,4,10 cookout 29:9 71:21 72:21,23 75:19 copies 91:14 copy 4:14,15,18 4:19,21 corner 59:13 correct 6:23 7:13 12:8 13:17 19:13 25:6,12 50:6 65:16 67:10 70:16 82:7,15 87:3 counsel 5:6,17 6:4 9:11,11 10:12,19,20,24 11:5 36:1,21 38:13 41:3,8 41:15 50:6 53:20 62:2 80:13 88:23 89:22 91:14 country 37:20 38:23 39:3 41:23 42:6,8 42:12,16 50:6 50:12,16 51:23 52:2 55:15	84:19 county 87:7 couple 21:14 70:9 82:9 85:5 course 35:14 courses 19:14 court 1:1 5:9 5:15 6:2,5,9,15 8:5,7,19 77:16 78:6,7 79:20 85:4 88:1 courts 41:5 crap 63:14 crr 1:22 88:12 90:4 cs 91:15 csr 1:22 90:4 current 5:3 54:20,23 85:11 currently 16:8 cut 68:2 cute 68:20 cv 1:5 5:11 88:5 d d 5:1 daily 13:3 dallas 2:18,23 16:12 22:12 24:13 80:21,23 80:25 89:14,19 damn 79:11 dark 45:23 47:11 date 30:25 90:1 90:5	daughter 21:8 davis 2:11 5:22 5:24 89:8 day 12:3 32:12 32:14,19,21,23 33:4 34:9 83:2 87:8,17 88:17 88:18 90:1 days 32:18 91:17 decision 47:12 defendant 1:8 2:9 5:6 88:8 89:6 defending 79:25 80:2 defense 62:2 definitely 82:25 degree 12:3 dental 16:21 deponent 63:1 91:13 deponent's 61:22 deposed 7:18 deposing 91:13 deposition 1:9 1:11 5:5 6:17 6:19 7:12 9:9 11:2 46:4,13 58:5,10 62:23 66:18,19 67:17 69:25 79:16,25 85:13 86:2 87:2 88:9,15	88:16,19,22 depositions 63:10 description 4:13 87:11 designated 4:17 devices 9:10 differences 54:8 different 70:19 83:23 dinner 24:14 diplomate 1:15 direct 30:1 discussing 32:22 discussion 63:9 distinction 18:14 distinctly 83:19 district 1:1,1 5:9,10 6:20,21 88:1,1 disturbance 61:13 document 3:4 33:25 59:1,5 87:11 documents 46:7 58:16 dog 68:15,19 68:20 doing 7:4 23:3 41:6 62:18
--	--	--	--

[doing - floor]

Page 6

66:14 78:12 double 41:17 doubt 75:8 dozen 41:5 duly 1:12 88:14 dwt.com 2:13 89:11	errands 18:9 19:3 errata 91:11,13 91:17 esq 2:4,10,10 2:17,21 89:2,7 89:8,13,18 esquire 91:1 established 55:7 61:3 et 1:3 5:7 88:3 91:4 evening 35:2,18 35:21 57:11 event 24:25 30:3 35:2 events 28:13 everybody 63:7 63:12,18 83:5 exact 21:11 exactly 19:2 35:3 41:6 52:6 examination 4:5,6 7:1 82:2 88:17 except 63:8,18 78:13 87:3 exchange 4:22 exclusively 13:25 excuse 41:14,14 excused 85:2 executed 87:13 exhibit 4:14,15 4:18,19,21	46:3,4,7,13 58:9,10,16,25 59:21 65:21 66:18,19 67:14 67:17 69:24,25 70:10 73:8 82:12 exhibits 4:11 22:6 46:12 experience 41:4 expiration 90:5 explain 18:5,15 18:20 37:6 80:5 expressed 87:15 extent 83:11	federal 1:19 41:5 fence 82:23 83:7 filed 5:8 film 64:14 filmed 38:3 45:22,24 64:17 66:11 filming 41:20 finance 13:23 13:24 14:1 financially 89:23 find 31:16 fine 54:19 78:19 finish 8:10,12 finishing 8:12 firm 2:22 5:16 89:18 90:6 first 9:5 17:8 17:15,16,23 19:19,23,24 20:2,8,12 21:1 21:17 22:17 23:6,8,21 32:11 52:15,23 54:5 five 42:21 54:18,19 77:15 fl 73:25 74:2 flag 82:21 83:7 floor 2:12 89:9
e		f	
e 4:19 5:1,1 11:1 67:16,22 67:23 68:10 earlier 10:2 50:11 64:2 71:23 73:1,5 81:6 earthlink.net 2:7 89:5 easy 63:15 eat 32:8 eden 16:25 either 26:13 27:5 28:11 58:22 77:4 78:8 employed 16:8 18:2 89:22 employment 16:20 17:5,9 17:23 encountered 32:12 ended 28:5 enjoy 32:17 enter 55:21		face 24:1,1,1,1 57:3 facebook 11:10 11:12,13,15,21 12:2,10,15,16 12:19 70:11,19 fails 91:19 falling 28:7 family 10:14 19:20,24 20:3 20:6,16 21:5 35:7,15 41:19 44:5,8 49:2,25 82:22 83:19 84:10 february 70:21	

[florida - god]

Page 7

florida 6:21 flynn 1:2 3:6 4:16 5:7 10:14 19:19 20:6,16 21:5,18 22:2 22:18,23 23:5 23:9,17,18,20 23:25 24:20 25:4,13,18 26:5,7,9,12,19 26:21 27:3,8 27:13,18,21 28:9 29:17,20 30:2,15,18,20 34:4,16,19 35:7,14,21 41:19 44:5,8 46:2 49:2,15 49:25 50:17 52:1 53:15 55:2 56:17 57:9,19 58:2 58:12 59:13,17 60:22 61:10 63:21 64:6,12 64:20 67:6,9 67:22 68:22 69:9 70:21 75:16,23 76:3 76:10,14,17,19 76:21,25 77:7 82:5,22 83:19 84:10 88:2 91:4	flynn's 26:9 49:12 83:6 flynns 12:5,10 12:14 13:5,8 14:4 16:6 20:7 20:9 24:25 29:3,7,16 30:11 31:18 32:12,23 33:4 34:21,23 35:23 36:3,10 39:2 39:22 40:7 41:25 42:11,25 43:5 47:5,17 47:23 48:3,4 48:11 50:5,11 51:3 66:6,13 72:9 folder 46:12 follow 82:10 following 88:13 88:23 follows 88:19 foregoing 87:1 87:12 form 30:6,22 32:1,24 36:19 37:23 38:5,12 39:8,23 40:10 41:2,21 43:2,7 44:14,23 45:12 45:17 47:2,14 47:18 48:7,22 49:9 51:21 52:19,25 56:14	57:13,23 60:16 60:18 61:1,12 63:23 64:9 65:24 68:23 71:8 72:4 74:9 74:16,17 75:10 75:17,24 76:4 76:12,15,23 77:2,8 79:8 83:8,12 84:1,6 84:16 fort 90:7 forward 62:25 forwarded 70:22 fourth 39:18 40:6 72:22 84:5 frame 24:8 friends 46:19 front 39:20 40:3 45:2 60:20 full 7:6 17:25 46:18 54:5 fund 17:3 further 81:23 89:22,23 future 57:6 g g 5:1 gab 15:8,10 ganske 2:17 89:14	general 4:16 21:18 22:2,18 22:23 23:9 29:20 30:17 49:12,15 50:17 52:1 53:15 55:2 56:17 57:9,19 59:13 59:17 60:22 61:10 63:21 64:6,12,20 67:9,22 82:22 83:6 generally 55:18 getting 21:6 44:4 84:14 gettr 15:16,18 ghw 1:5 5:11 88:5 give 6:11 8:17 20:24 37:17 53:23 given 37:7 87:16 88:15,22 giving 80:12 glad 74:10,11 go 7:20 11:14 11:17,21 28:21 32:19 41:12 59:10 63:6,17 67:7 71:14 83:5 85:5,7,9 god 6:13 83:20 84:3,11,15
---	---	---	---

god's 84:18 going 7:20 10:24 22:12 30:4 36:10,18 40:24 41:8,15 44:17 46:1,7 47:1,2 51:4 53:22 58:7 62:25 63:5,16 66:16 67:7 71:13 77:14 78:16 79:17,19 good 5:2 7:3 62:20 74:1,14 74:20,24 75:2 75:18 82:5 gosh 73:14 gotten 76:5 great 8:22 9:8 84:19 green 16:25 ground 7:20 group 42:1 guardian 66:23 guess 22:10 54:14 guy 39:13 guys 63:15 gym 17:6	handed 37:9,12 37:19 handle 13:20 handling 79:12 happen 44:10 51:2 happened 52:23 65:4 happy 9:2 37:20 38:23 39:3,18 40:2,6 41:23 42:6,8 42:12,16 46:19 47:5 49:25 50:12,16 51:22 51:23 52:2 55:15,22 57:8 66:10 74:3,11 74:12 75:5 80:5 84:4 he'll 41:7 head 8:18 heading 74:1 hear 61:15,17 78:1,8,10,15,18 78:25 heard 21:22 36:16 46:18 55:13 66:22 67:6 83:19,22 hedge 17:3 hell 79:17 help 6:12 19:10 22:6 57:2 74:1	helped 18:6 helping 18:9 19:7 hi 23:4 71:18 hold 19:16 30:5 61:14,15 holmes 2:21,22 9:24 10:1 63:2 63:3,7 79:9,10 79:24 80:1 89:18,18 91:1 home 34:5 35:21 hope 74:4 horrible 62:9 hosting 45:8 hotel 31:15,17 31:19,21 62:2 65:5,12 hour 9:17 10:4 53:21,22 54:2 88:20 house 25:1 45:11 71:21 74:2 huh 60:10	impromptu 66:8,9 improper 40:25 includes 88:23 index 4:1 information 88:22 instagram 12:22 13:1,8 instruct 80:17 instructing 40:15 instrument 87:13 interested 89:24 interfere 40:22 interfering 61:21 interpret 72:20 74:8 84:12,18 invite 30:12 invited 29:13 29:17,21,23,24 29:25 30:15 inviting 30:2 involved 63:8 irrelevant 79:16 island 19:25 20:3,8 21:2 24:6 29:7 30:4 31:1 73:17 issue 19:9
h		i	
h 2:21 89:18 habit 71:3 hand 6:6 42:17 87:16		identification 82:11 identity 87:11 immediately 64:21 65:6 implication 62:1	

[jack - listened]

Page 9

j	56:21 57:12	45:23 46:23	learned 33:9
jack 1:2 3:6 5:7	59:14,18 61:11	47:15 52:16,20	led 49:7
25:13,18 26:9	63:22 65:3,6	53:6 55:1,3,6	left 45:11 59:13
34:15 68:22	65:17 66:6,10	55:12 56:9,12	legal 90:5
71:19 72:2	67:2,10,25	56:15 59:22,23	91:23
73:25 74:14	68:20 69:5,10	60:6 61:16,19	leslie 26:5,7,9
75:16,23 82:4	71:21 72:21,23	62:17,22,25	26:12,19,21
88:2 91:4	82:19 84:5	64:7,8,10 66:1	34:16 69:9
jefferson 16:21	june 16:18	66:2 67:4	70:21 71:13,18
job 1:23 17:15	22:19	70:13,23,25	72:3,11,12
17:15,16	justice 66:23	71:10 72:13,17	73:24 74:14,24
joe 20:9 23:20	k	74:18 75:11	76:3,10 82:5
23:25 24:9	kate 5:23 62:7	76:7 77:4	lewis 2:17
27:13 34:13,18	78:10	79:12,17 80:4	89:13
67:6	katherine 2:10	80:20,23 81:3	licensed 19:11
joe's 20:10 25:5	89:8	81:4,10,14	light 34:9
john 1:2 88:2	keep 62:25	knowledge	lindsey 2:10
91:4	keeps 63:17	27:2	5:21 41:12
jr 27:3,8,18,21	kelly 1:15,22	known 33:20	46:6,21 58:14
july 20:16,18	5:15 88:12,17	87:9	58:15 79:14
20:19 21:15	90:4	knows 58:12	89:7
24:7,10,25	kind 70:18	79:21	lindseycherner
25:4,10,21	kinds 83:23	l	2:13 89:11
26:13 27:5,6,9	knew 57:1	l 2:17 89:13	line 44:4,6,9
28:11 29:7,13	know 8:2,16	l.i.p. 2:11 89:8	47:17,23 48:1
30:4 31:1,3,5,7	9:2 11:12,13	labeled 4:16,18	60:1 62:23
31:12,24 32:13	11:14 14:5	4:20,22	86:5
32:17,20 34:11	18:11 22:11,13	large 82:21	link 11:13
36:4 37:20	29:18,21,21	laurent 2:22	70:22 71:1,7
38:4,8,9,19,24	30:14,19,23	89:19	linkedin 16:1,3
39:18 40:6	31:12,19,20	law 2:4,22	16:5
41:23 42:6,8	33:17 37:25	18:24 19:1	links 71:3
42:12 44:17	39:6 40:25	89:2,18	listen 61:21
45:3 51:24	41:5,10 43:3	lawyer 18:7,8	listened 9:11
52:2 56:2,4,6	43:20,21 44:3		46:21

[listening - misleading]

Page 10

listening 61:16 62:23 litigation 80:10 little 53:3,9 lives 79:22 80:15 lobster 75:19 locations 1:18 locked 62:8,9 logistics 22:10 long 9:16 10:3 16:15,22 35:20 42:15,17,20 65:9,10,15 74:3 75:5 longer 12:7 look 57:3 60:8 63:2 65:21 70:14 looked 54:14 70:25 looking 71:20 82:24 looks 78:2 lori 20:10 23:5 23:17,18 34:13 74:1,2,11 75:5 76:14,17,21 lot 34:23 39:14 66:7 lsessions 2:20 89:16	m m 2:10 73:15 73:20 89:8 ma'am 8:9 made 47:12 mail 4:19 11:1 67:16,22,23 mails 68:10 main 2:5 89:3 maintains 18:23 make 11:1 58:15 61:22 62:24 63:14 73:12 making 18:14 male's 62:21 mark 46:2 54:2 58:8 66:16 67:12 69:22 marked 46:5 46:11 58:11 66:20 67:18 69:25 82:11 market 13:21 13:22 married 21:6 matter 5:7 mean 18:5,15 18:20 19:6 20:5 23:13 36:19 37:25 39:12,13 42:3 43:8 44:5 47:11 50:5	52:10 54:12 58:1 66:2 69:21 84:12 means 18:11 23:24 25:17 53:7 meant 38:20 media 5:5 11:7 15:21,23 26:2 26:22 28:19 29:1 56:19 57:11,21 70:17 meet 9:13 19:19,23 24:21 25:14 26:6,12 27:4 28:10,12 meeting 34:24 36:4 member 21:6 members 10:14 20:16 35:7,15 49:2 82:22 83:19 84:11 mention 56:2 81:19 mentioned 56:7 58:2 73:3 message 4:21 16:6 26:19,21 69:10,12,13,14 69:15,17 70:2 70:5,11 71:13 71:15,22,25,25 72:1,1,11 74:6 74:24,25	messenger 12:16,19 16:5 26:2 70:11 messaging 70:17 met 19:25 20:2 20:7,12,12 23:14 24:22 35:9 82:6 method 1:17 mgmspllc.com 2:20 89:16 michael 3:4,5 27:3,8,17,20 29:20 30:17 midatlantic 91:15 middle 6:21 7:9 mike 20:9 29:18,19 33:9 34:13 51:11 53:10 54:10 74:2,11 75:5 mike's 71:21 mind 22:16 minute 30:5 41:15 42:20 77:15 minutes 53:24 54:18,19 88:20 88:21 mis 40:18 misleading 40:19
--	---	---	--

[misquote - objection]

Page 11

misquote 41:9 misquotes 40:18 misspoke 50:5 50:9 misstate 41:8 misstates 40:11 mktrvn 11:11 mom 10:21 22:18 29:24 30:3 31:21 37:9,12,13 39:19 40:5 42:7 43:11,14 44:1 49:2 65:20 66:5,14 66:22 67:2 73:21,22 74:5 77:12,24 78:22 79:1,11 81:7 mom's 79:21 82:14 moment 28:24 months 16:23 20:23 21:14 22:24 72:14 80:9 moore 2:17 89:14 morning 5:2 7:3 31:25 81:18 82:5 mother 10:10 18:3 29:7,25 30:12 35:12,15	37:1 80:21 move 47:12 63:18 74:1 moved 44:12 movement 33:15,18,21 56:19 57:12,21 moving 62:14 murr 2:17 89:14 mute 63:8,12 63:18 muted 63:3 78:3,8 n n 2:18 5:1 89:14 name 5:12 7:6 7:9 11:10,12 11:14,17,21 12:22 14:23 16:2 20:7,10 21:7 87:12 90:1 named 29:4 names 34:24 35:11 nature 8:24 23:17,18 33:6 necessarily 71:5 84:8 need 18:8 needed 18:8 19:10 37:17 38:3,9,21 40:5	needs 63:7,12 neither 89:22 network 1:6 5:8 88:6 91:4 never 15:6 18:10 22:16 25:24 33:20,23 34:2 39:21 69:2 new 1:1 2:12,12 5:10 6:20 17:2 17:9,11,12,13 17:18,19,21,22 17:22 74:2 88:1 89:10,10 news 1:6 5:8 88:6 91:4 night 25:11 34:5 60:25 65:23 67:5 nine 72:14 nodding 8:19 nods 18:1 normally 32:8 notary 87:22 note 11:1 55:10 91:10 noted 72:3 87:3 notice 82:20,23 noticed 6:19 noticing 5:19 noting 54:1 number 5:10 46:4,13 58:10 66:19 67:17	numbered 1:13 o o 5:1 oath 6:7 7:25 33:15,17,21 35:24 36:4,10 36:14,17,20,25 37:22 55:8,14 55:18,20 56:18 56:19 57:11,20 57:21 87:10 object 8:23 30:6 36:18 37:23 38:5 43:7 44:14,23 47:1,2,18 52:19,25 56:14 61:12 63:23 64:9 65:24 68:23 72:4 74:9,16,17 75:10,17,24 76:4,12,15,23 77:2,8 83:12 84:1,6,16 objecting 79:7 79:10 objection 30:22 32:1,24 38:11 38:12 39:7,8 39:23 40:10 41:21 43:2 45:12,17 47:14 48:7,22 49:3,9 50:4 51:5,21
--	---	--	--

[objection - phone]

Page 12

57:13,23 60:4 60:16,17,18 61:1 62:12 71:8 81:11 83:8 occasionally 19:8 office 2:4 36:14 36:17,20 55:8 55:14,19,20,21 87:16 89:2 officer 88:14,22 oh 56:7 73:14 78:11 okay 7:20 8:3,8 8:14,20 9:6,20 9:25 10:7,13 10:16,21,23 11:3,19 12:1,4 12:7,18,20 13:18 14:3,7 14:25 16:2,8 16:19,24 17:4 17:8 18:2 19:11,19 20:11 21:4,11,17 22:22 24:9,20 25:3,13,17,24 26:11 27:3 28:9 29:11 30:20 31:7,16 31:23 32:5,11 33:11,14 35:6 36:9,25 42:15 43:14 44:20	45:5,15 46:1 47:12 48:20 52:7 54:15 55:9,13 56:7 56:17 57:4 58:7 59:3,17 59:25 60:8,22 61:6,10,18 62:5,11 63:5,9 63:16 64:5 65:15,17,20 66:13 67:6,12 67:22 68:4,9 68:18 69:20 70:5,9 71:12 72:2,9 73:7,8 73:22 75:1,8 75:15,22 76:2 77:14 78:25 80:11 81:23 82:10,17 84:21 84:23 once 22:24 68:11 ones 43:9 online 56:18 opinion 75:15 76:2,9,14,17,20 77:1,6 opinions 75:22 oral 1:9,11 8:17 86:2 88:9,15 original 71:20 72:10,20	orleans 17:2,18 17:19,22,22 orthodontics 16:21 outcome 89:24 own 31:18 80:16 owns 80:15 p p 1:2 5:1,7 88:2 91:4 p.l.l.c. 2:17,22 89:14,18 p.m. 59:14 60:23 63:22 67:25 68:7 page 4:2,13,15 4:19,21 71:14 73:8 86:5 paralegal 19:14 19:17 pardon 62:13 62:15 parkway 2:18 89:14 parler 14:17,19 part 56:18 57:11,20 60:14 68:2 participants 62:22 particular 56:23 58:25 parties 88:23 89:22	party 44:17,20 45:3,7,9,16 88:19 pass 29:12 37:6 37:21 patreon 14:21 15:1,3,4,6 patriotic 55:19 pay 18:12 payroll 18:10 pc 18:17,18,24 pending 9:4 people 35:1,4,6 35:9 39:1,14 54:10 55:18 56:1 63:8 period 22:25 41:9 person 9:14 10:5,6 20:13 24:2,9,12 25:19,20,22 26:16 27:9,14 28:10,12 53:13 87:12 personal 23:1 23:17,19 personally 18:4 18:6,13,15 29:23 30:2 84:18 87:9 phone 10:5,25 12:17 37:4,7,9 37:12,19 48:14 49:16,19 50:3
---	---	---	---

[phone - quote]

Page 13

50:18,25 51:19 51:19 53:10 54:11 55:2,6 55:11 63:25 64:3,6,17,18 82:14 photo 39:5,10 43:1 photos 67:9 68:10 phrased 40:13 80:18 picture 39:15 pictures 39:14 place 2:22 62:9 89:19 plaintiffs 1:4 2:3 6:1 88:4 89:1 planned 57:10 platform 15:21 26:3 70:18 plays 46:14 66:20 please 6:3,6 8:1 8:10,17 9:2 28:22 30:9 42:2 43:18,19 43:24 54:2 57:7,15 59:8 68:6 73:12 80:4,7 85:10 point 7:25 33:8 33:14 56:20,23 62:20	pool 68:15 posing 44:11 possible 71:6 post 57:10,20 59:17 posted 56:18 58:16 60:14,22 65:18 66:6 postings 14:1 powell 1:9,12 4:4 5:6 7:3,8 9:8 10:18 11:8 16:4 18:3,23 47:5 55:1 57:6 59:12 61:7 63:21 70:2 77:22 80:9,15 80:20 84:25 86:3 87:1,9 88:10,14 91:5 powell's 64:3,6 64:18 powelw10 12:25 practice 18:24 19:1 practiced 52:7 practicing 51:3 prepare 9:9 presence 84:19 present 3:2 5:17 pretty 54:7 previously 12:6 13:6 15:1	20:15 61:9 63:24 prior 16:19,20 20:16 36:17 probably 10:4 23:13,22 25:16 29:18,19,20 81:18 problem 19:9 procedure 1:19 proceed 6:4 9:12 proceeding 89:23 produced 1:12 26:24 28:20,22 37:1 40:18 58:8 66:17 67:13 69:8,23 production 28:21 professional 17:8,23 18:24 profile 11:13 proper 41:7,11 properly 63:11 properties 79:22 property 79:1,6 proved 87:9 provisions 1:19 public 87:22 purpose 21:1 purposes 13:3 14:6 87:14	pursuant 1:18 88:22 put 10:24 46:7 63:13 px 4:16,18 58:8 66:17 q quebec 62:3,9 question 8:1,11 8:13,24,25 9:4 9:5 30:9,10 33:1 38:15,17 39:25 40:12,16 40:18,22,23 41:1,7 43:21 43:24 44:7 45:19 46:22,25 47:3 48:24 50:9,21 55:5 57:7,7 61:6 74:21 78:17 79:8,11 80:6 80:18 82:17 83:17 questions 7:24 8:6 22:8 43:19 55:4 66:8 70:9 81:24 82:1,10 84:22,24 85:5 quiet 62:25 quizzical 57:3 quote 40:24
--	--	--	---

[r - represent]

Page 14

r			
r 5:1	46:16 64:20	referencing	44:15 45:13,25
raise 6:6	65:9,15 66:13	69:11 71:23	47:24 48:8
raven 13:21,22	68:13 83:1,4	referring 18:23	49:10 51:1
rdr 1:22 88:12	83:10,13	24:24 36:6	52:6,16 53:6
90:4	recalls 36:23	69:13,17 70:6	53:14,17,19
reach 69:4 72:2	receipt 91:18	70:8 72:18	65:10,19 68:17
72:9	receive 71:4	refresh 31:8	68:24 69:3,19
reached 22:12	received 36:25	58:19 59:8	71:2,9 72:7,12
69:6 71:19	56:9 71:6	60:13,23 67:1	73:23 83:14,24
reaching 72:12	recess 54:22	refreshed	remind 26:7
72:13	77:18	58:20	reminding
read 50:2 53:10	recognize 62:7	refreshes 61:4	35:12
54:10 87:1	recollection	refreshing 59:6	remote 1:9,11
91:9	22:9 28:24	registered 1:15	86:2 88:9
reading 49:16	31:9 42:24	registration	remotely 1:18
49:18 50:17,25	45:22 47:9	90:6	62:23
55:2,6,10	60:13,24 61:4	regular 21:10	repeat 11:19
ready 54:1	66:4 67:1	related 89:22	38:7 43:23
real 11:17	69:16	relationship	51:8,10,20
really 52:9,10	record 1:20 5:4	29:4 68:21	52:3,12 68:6
66:8 75:18	5:19 7:7 10:25	relaxing 32:16	repeated 54:10
76:6 78:9	48:12,18 54:21	relevant 50:19	rephrase 8:2
realtime 1:16	54:24 61:25	80:10	30:9 40:2 50:9
reason 12:13	62:16 63:6,17	remember	reported 1:16
28:4 75:8 83:5	77:17,20 79:15	12:11 13:10	1:22
86:5 91:11	85:6,7,10,12	20:17,22 21:5	reporter 1:15
reasons 23:2	88:15,23	21:6,19,22,24	1:16 5:15 6:3,5
recall 21:11	recorded 5:5	22:5,14 23:7	6:9,15 8:5,7,19
22:1,8,15,22	37:4 63:25	23:12 24:16,22	77:16 78:6,7
31:24 32:22	64:3 82:18	25:23 27:15,25	85:4
33:3,6 34:14	redgate 28:9	28:17 31:2,15	reporter's 4:8
34:15,21 35:11	refer 73:20	32:3,13,20	represent 6:1
35:17,20,24	reference 73:17	34:3,6,8,11,18	31:7 41:16
36:5,23 45:15	referenced	34:24 35:3	68:4 82:4
	17:10 91:6	36:15 42:23	

[represented - sessions]

Page 15

represented 7:11	50:13 51:19 52:8 59:18,21	says 60:11 68:9 71:18 72:5	seen 33:23 34:2 47:8 55:22
representing 5:13 7:15 22:19	60:3 62:19 64:3 65:21 66:11,24 67:7	73:24 74:20,23 75:4	56:1 74:2 75:4 81:1
request 33:25 47:20	67:23 70:12,15 73:18 74:15	screen 46:10 65:21 70:3	send 64:12,21 64:25 68:9,12
requested 9:11	75:2,6 77:22	seafood 29:9	sending 68:10
required 52:23	77:24 78:23	seal 87:16,16	sends 67:22
resay 53:11	79:25 80:21,23	searching 31:18	sense 35:16
reserve 81:25	81:8 82:9,21	second 4:14,18 24:23,24 52:15	sent 67:9,11 91:14
respond 73:10 73:14	83:1,16 84:20	52:17,22,24 53:12,18 54:6	sentence 67:16
response 73:24 77:25 78:18	robert 2:21 89:18 91:1	54:11 56:8,10 56:12 59:25	separate 1:18
responses 8:17	rock 17:6,17	60:2 61:14,15 71:13,14 73:8	separately 45:7
rest 45:7	role 16:15	seconds 42:21	sequence 32:3
restate 38:16 41:13 45:18	room 62:2,16	see 22:10 23:3 24:2,9,12	series 7:23
return 88:17 91:13,17	rules 1:19 7:21	25:22 26:15 27:8 43:18	serve 80:8
review 91:7	rumble 15:12 15:14	50:19 59:7,12 59:14,15 60:11	service 16:11
rhholmes 2:24 89:20 91:2	running 18:9 19:3	60:19,19 67:20 68:1,2,5 69:12	sessions 2:17 2:17 7:17,21
rhode 19:25 20:3,8 21:2	s 2:4,4 5:1 89:2 89:2	70:2,22 71:12 71:16 74:4,6	8:23 9:13,21 11:4 18:22
24:6 29:7 30:4 30:25 73:17	satisfied 54:13	74:23,25 75:4	30:5,22 32:1 32:24 35:25
ri 73:16,17,25	saturday 7:4,5 31:8	seeing 34:11,15 34:18 58:17,22	36:18 38:11 39:7,23 40:10
right 6:6,22 9:6 13:16 19:12	saw 27:13 33:25	58:24	40:17,21 41:3 41:14 43:2,20
29:1,8 33:12 42:9 43:11,15	saying 15:1 25:9 29:20	seems 74:14 76:18 84:24	45:12,17 47:1 47:14 48:7,22
44:2,13,18,22 46:16 49:13	37:14 38:19 39:2 42:11 45:10 75:1		49:3,9 50:4,8 51:5,21 53:20
			53:25 54:17 56:22 58:21,24 59:4,9,22 60:4

[sessions - suzanne]

Page 16

60:17 61:1 62:13,15,20 71:8 74:17,21 78:12,16,19 79:2,7 80:2,7 80:11,17 81:11 81:25 85:1 89:13,14 seven 16:23 several 20:23 22:24 32:18 81:1 shaking 8:18 share 46:8,12 58:16 shared 46:10 sheet 91:11 short 22:25 show 69:12,14 69:15 73:7 sidney 18:3 37:1 64:3,6,18 sign 91:12 signature 4:7 86:1 87:2,5 88:17 90:3 signed 91:20 sir 82:5 83:16 84:21 six 49:2 social 11:7 14:7 14:10 15:21,23 26:2,22 28:19 29:1 56:19 57:11,20 70:17	software 16:11 solemnly 6:10 solutions 90:5 91:23 somebody 53:1 53:16 61:15,17 63:14 sorry 11:19 15:3 17:11,12 17:15,19 19:21 20:18 22:16 38:7,16 40:14 44:24 60:9 62:8 78:1,10 78:17 sort 55:8 sound 62:21 78:8 southern 1:1 5:10 6:20 88:1 speak 9:25 10:7 10:10,13,15,16 10:19,21 40:7 76:6 speaking 68:25 specific 12:13 36:1 42:2 specifically 22:5,13 48:17 52:1 56:4 82:24 83:14 specify 36:21 57:2 speculation 60:5 61:2	65:25 84:7 spelling 85:5 spoke 10:12,19 22:13 25:7,10 69:2 spoken 42:22 st 2:22 89:19 standing 39:20 40:3 44:9 60:1 start 16:17 71:14 started 22:19 40:8 48:4 51:13,16 starting 31:24 state 5:18 7:6 53:2,8 62:12 81:4,10 87:6 87:23 88:12 stated 1:20 61:9 73:1,5 states 1:1 5:9 88:1 stay 31:14 stayed 31:17 stenographic 1:17 steve 5:25 82:4 steven 2:4,4 89:2,2 stevenbiss 2:7 89:5 stipulate 6:17 stop 12:9 13:7 61:20,23	stopped 12:14 street 2:5 89:3 90:6 structure 8:24 stuff 18:9 styled 1:13 submitted 88:16 subpoena 9:21 10:1,8,11,14,17 34:1 subscribed 87:12 90:1 suite 2:5,18 89:3,15 90:7 summer 20:25 supporting 76:18 sure 13:10 30:11,15 40:2 53:7 58:15 70:18 71:18 73:14 surf 33:9,10 surfing 32:19 33:12,12 surprised 49:18 50:16,22 surprising 50:1 suspect 30:17 suspended 15:20 suzanne 1:15 1:22 5:15 88:12,17 90:4
--	--	--	--

[suzi - told]

Page 17

suzi 85:8 swbell.net 2:24 89:20 91:2 swear 6:3,10 swimming 68:15 sworn 1:12 88:14	64:22 65:1,13 67:3 69:5 72:15,22,24 77:18 83:3 88:23 89:23 takes 52:11 taketheoath 33:23 34:2 60:11,14 talk 8:7 9:20 62:3 75:12,12 75:20 77:3 talked 81:16 82:6 talking 19:1 61:17,20,23 63:17 79:2 taller 39:13 taught 33:9 teamed 41:17 technician 3:4 59:1,5 technology 16:25 tell 36:22 42:19 43:21 49:15 telling 30:3 testified 40:4 40:11 49:24 50:11 64:2 81:6 testify 63:1 79:19 80:14 testifying 40:9	testimony 6:10 61:22 65:11 88:15,22 91:9 91:18 texas 2:19,23 88:13 89:15,19 90:7 text 22:4 26:19 27:21 28:1,16 60:9 70:14,16 texting 22:1 texts 25:25 thank 6:15,24 7:3,5 54:17 84:21 85:1,10 thing 42:1 51:8 63:15 66:8,9 84:19 things 19:7 think 11:11,11 18:22 21:21 22:11,20,20 25:7,9 26:23 26:24 27:15,16 28:3,17 30:20 31:4,5 32:18 40:19 42:1,5 47:19 49:14 50:9 51:7 52:11 53:1,11 55:7,18,18 56:25 58:12 61:8 67:11 69:6,6,7 70:16 72:6 79:14,17	80:22,25 82:6 84:13,14,18 thought 17:21 17:21 53:2,8 three 88:21 throckmorton 90:6 throwing 63:14 time 5:3 8:22 8:22 9:1 17:25 18:2 20:2,8,12 20:24 21:12,17 22:11,18,25 23:6 24:7 29:6 32:11 34:4 35:23 36:3,10 42:4 45:22 47:9 48:14 49:5 54:11,20 54:23 56:5,24 59:14 61:9 65:8,12 68:5,6 74:3 75:6,13 77:19 78:25 81:14,16 85:11 88:19,22 91:19 timeframe 91:8 toast 66:14 67:2 today 7:16,24 9:18 81:18 82:18,20 83:18 together 48:3 told 36:9 38:22 39:17 40:5
---	--	---	--

[told - videotaped]

Page 18

42:7,13 55:24 55:25 82:13 took 24:13 35:23 36:3,11 37:1 38:19 42:17,20 77:22 78:21 82:14 83:18 top 60:8,9 67:15 toth 3:4 46:11 tothic.com 3:5 transcript 88:14,16 91:6 91:20 traveled 31:10 tremaine 2:11 5:22,24 89:8 trick 8:1 tried 80:6 trip 20:19,21 20:22 21:2,3 24:4,23,24 25:4 32:21 33:8 true 87:3 88:15 truth 6:11,12 6:12 14:7,10 try 8:7 40:24 59:5 trying 8:1 32:17 35:16 38:18 40:22 49:25 50:12,15	turning 78:13 78:14 tweet 4:15 14:4 59:13 60:9 tweeted 14:5 twice 66:11 twitter 13:18 13:20,24,25 14:3 33:24 two 4:21 28:13 52:11 53:24 54:9 62:16 73:1,4 types 19:6 u uh 60:10 under 7:24 87:10,16 understand 7:25 30:10 32:25 38:18 39:25 44:7,25 48:23 49:22 79:23 understanding 38:2 unifocus 16:14 unit 5:5 united 1:1 5:9 88:1 unmute 78:4 unnatural 8:16 use 12:1,4,19 13:1,4,25 14:3 14:6 16:5	used 6:21 14:24 55:14,22 88:19 88:20,21 91:20 user 11:10,12 12:22 14:23 using 82:14 v v 91:4 vacation 32:16 valerie 20:10 24:20 25:4,5 34:18 76:25 77:7 various 13:3 83:22,22 verify 91:9 veritext 5:13,16 90:5 91:14,23 veritext.com 91:15 version 52:17 60:2 versions 73:4 versus 5:7 32:13 video 4:14,18 36:6,17,25 37:2,8,11,14,18 37:22 38:10,20 38:21,23 39:1 39:17,21 40:4 40:5,8 41:16 41:20 42:7,25 43:6,12,13,15 43:17,18 44:1	44:8,11,13,21 45:2,7,22,24 46:14,16,18 47:6,8,13,23 48:4,12,18 49:12 51:2,12 51:15 52:8,14 52:18 53:12 54:5,5,6 56:8,9 56:10,12,18 57:10,20 59:18 59:20,25 60:3 60:24 61:11 63:22 64:2,5 64:12,14,21,25 65:13,18 66:9 66:11,20,22 67:11 68:13,14 72:3 73:2 82:11,14,18 83:2,17 videographer 3:3 5:2,14 6:2 54:20,23 77:19 85:11 videos 39:14 54:9 65:3,7 67:3 68:10,12 68:16 69:5 71:20 72:10,15 72:17,20,22,24 73:2 videotaped 1:9 1:11 86:2 88:9 88:15
--	--	---	---

[viral - younger]

Page 19

viral 67:7 virginia 2:6 21:23 89:4 voice 62:7,21 vs 1:5 88:5	week 10:2 weekend 19:25 23:22 24:10 25:16 26:13,14 27:6,7 28:11 31:1 32:17 39:16 67:10 weekends 25:15 weeks 81:1 weird 78:9 went 24:4 29:7 33:12 65:5,7 65:12 west 2:5 89:3 whereof 90:1 whispering 62:18 whispers 61:23 wife 25:5 26:10 69:6 76:18 wife's 20:10 william 2:17 89:13 wilson 1:9,11 4:4 5:6 7:8 11:23,24 16:4 63:19 67:13,20 71:18 79:9 86:3 87:1,9 88:10,14 91:5 wish 37:20 38:23 39:2 41:23 42:5,8 42:12 49:25	50:12,15 51:23 52:2 55:14 66:9 wishing 42:16 witness 1:12 2:16 6:3,8,14 18:23 21:24 23:13 30:23 32:2,8,25 36:22 37:25 39:24 40:11 41:1,22 43:3,8 43:23 44:15,24 45:13,18 47:15 47:19 48:8,23 49:4,10 51:7 51:22 52:20 53:1 56:1,15 56:25 57:24 59:23 60:6,19 62:17 63:24 64:10 66:1 68:24 71:9 72:6 74:10,18 75:11,18,25 76:5 77:3,9 80:18 81:13 83:13 84:8,17 87:5 88:14,15 88:17 89:12 90:1 91:8,10 91:12,19 witness's 6:7 woke 32:7	wonderful 74:4 wondering 26:25 50:1 55:21 words 42:22 84:3 work 68:11 worked 17:6 18:6 worth 90:7 wright 2:11 5:22,24 89:8 wrong 13:15
w			y
wait 8:10,12 20:18 wake 32:5 walk 31:23 want 6:17 10:25 28:24 41:17 52:2 62:24 69:14 73:7 82:10 wanted 37:20 38:22 39:2 41:22 42:5,12 51:23 83:5 watched 52:14 59:20 72:25 82:18,20 83:17 83:18 way 8:19 63:11 wbp 4:20,22,22 67:14 69:23 we've 82:6 website 55:10 wedding 19:24 21:3,4,10,12 23:14,22 24:3 24:23 25:16,21 26:13 27:5 28:11			yard 45:24 47:13 48:5,12 48:18,21 49:1 49:8,13 51:18 yeah 7:5 26:9 53:23 57:4 58:23 year 12:12 13:9 16:16 years 24:17 41:4 yesterday 9:18 9:19 york 1:1 2:12 2:12 5:10 6:20 17:9,11,12,13 17:22 88:1 89:10,10 younger 17:7 19:10

[youtube - zoom]

Page 20

youtube 70:23
z
zoom 5:23 67:15 70:6

Federal Rules of Civil Procedure

Rule 30

(e) Review By the Witness; Changes.

(1) Review; Statement of Changes. On request by the deponent or a party before the deposition is completed, the deponent must be allowed 30 days after being notified by the officer that the transcript or recording is available in which:

(A) to review the transcript or recording; and

(B) if there are changes in form or substance, to sign a statement listing the changes and the reasons for making them.

(2) Changes Indicated in the Officer's Certificate. The officer must note in the certificate prescribed by Rule 30(f)(1) whether a review was requested and, if so, must attach any changes the deponent makes during the 30-day period.

DISCLAIMER: THE FOREGOING FEDERAL PROCEDURE RULES ARE PROVIDED FOR INFORMATIONAL PURPOSES ONLY.

THE ABOVE RULES ARE CURRENT AS OF APRIL 1, 2019. PLEASE REFER TO THE APPLICABLE FEDERAL RULES OF CIVIL PROCEDURE FOR UP-TO-DATE INFORMATION.

VERITEXT LEGAL SOLUTIONS
COMPANY CERTIFICATE AND DISCLOSURE STATEMENT

Veritext Legal Solutions represents that the foregoing transcript is a true, correct and complete transcript of the colloquies, questions and answers as submitted by the court reporter. Veritext Legal Solutions further represents that the attached exhibits, if any, are true, correct and complete documents as submitted by the court reporter and/or attorneys in relation to this deposition and that the documents were processed in accordance with our litigation support and production standards.

Veritext Legal Solutions is committed to maintaining the confidentiality of client and witness information, in accordance with the regulations promulgated under the Health Insurance Portability and Accountability Act (HIPAA), as amended with respect to protected health information and the Gramm-Leach-Bliley Act, as amended, with respect to Personally Identifiable Information (PII). Physical transcripts and exhibits are managed under strict facility and personnel access controls. Electronic files of documents are stored in encrypted form and are transmitted in an encrypted fashion to authenticated parties who are permitted to access the material. Our data is hosted in a Tier 4 SSAE 16 certified facility.

Veritext Legal Solutions complies with all federal and State regulations with respect to the provision of court reporting services, and maintains its neutrality and independence regardless of relationship or the financial outcome of any litigation. Veritext requires adherence to the foregoing professional and ethical standards from all of its subcontractors in their independent contractor agreements.

Inquiries about Veritext Legal Solutions' confidentiality and security policies and practices should be directed to Veritext's Client Services Associates indicated on the cover of this document or at www.veritext.com.